



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460-0001

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

December 5, 2008

Ms. Nancy Huebl,
Senior Registration Specialist
Wellmark International
1501 East Woodfield Road, Suite 200 West
Schaumburg, IL 60173

**Subject: Amending Labeling, Addition of Commercial/Industrial Sites and Deletion of Pests
RF 9910 Aerosol, EPA Reg. No. 2724-490
Your Submission Dated September 3, 2008**

Dear Ms. Huebl:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable with the following provision(s):

General Statement:

1. Delete all text throughout the label marked with "strikethrough."
2. In the 1st paragraph at the top of page 2 of 3, delete the statement "[a full season's]" since a season can indicate protection for an entire year (365 days) in certain regions of the country.

Optional Marketing Statements section comment(s):

3. In the 19th optional marketing statement, revise the words "... and Other Commercial and Industrial Buildings." with " to read: "... and Commercial/Industrial Buildings."

Ingredient Statement section comment(s):

4. Replace this section with:

ACTIVE INGREDIENTS:

(S)-Methoprene (CAS #65733-16-6)	0.085%
Permethrin (CAS #52645-53-1)	0.350%
Phenothrin (CAS #26002-80-2)	0.300%
N-octyl bicycloheptene dicarboximide (CAS #113-48-4)	2.000%
Piperonyl butoxide, technical* (CAS #51-03-6)	1.400%
OTHER INGREDIENTS**:	<u>95.865%</u>
TOTAL:	100.000%

*Consists of 1.120% (butylcarbityl)(6-propylpiperonyl) ether and 0.280% related compounds.

**Contains petroleum distillates.

Directions for Use section comment(s):

5. Within the "FOR USE IN THE HOME/GARAGE/KENNEL" section, in the 9th sentence of the subsection labeled "Apply treatment," replace the word "children" with the word "people."
6. Within the new "FOR USE IN: Hospitals, Hotels, Motels, ..." section, in the 5th sentence of the subsection labeled "Prepare Treatment Areas," replace the word "children" with the word "people."

Directions for Use section comment(s), continued:

- 7. Within the new "FOR USE IN: Hospitals, Hotels, Motels, ..." section, in the 7th sentence of the subsection labeled "Prepare Treatment Areas," insert the word "thoroughly" immediately preceding the word "ventilate."

Storage and Disposal Statement section comment(s):

- 8. To facilitate inclusion of language from PR Notice 2007-4, replace the first part of the "Disposal:" subsection with: "Pesticide Disposal: If empty: Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available." The "If partially filled:" portion of this statement does not need to change.

Precautionary Statements, Hazards to Humans and Domestic Animals section comment(s):

- 9. In the 1st sentence, insert the word "hands" immediately preceding the word "thoroughly."

Warranty & Disclaimer section comment(s):

- 10. In the future, Wellmark International should submit a label amendment revising the "WARRANTY" section (label statement on page 3 of 3 in accordance with the guidance document entitled, "Guidance on Warranty Statements," dated October 17, 2006. This update can be found at the following hyperlink: <http://www.epa.gov/pesticides/regulating/labels/warranty.pdf>.

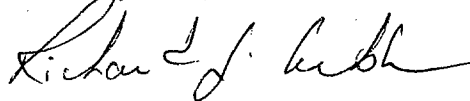
Wellmark International should note that a notice of availability of EPA's reregistration eligibility decision (RED) document for products containing piperonyl butoxide was published in the *Federal Register* on July 26, 2006 (Volume 71, Number 143, Pages 42385-42386). As a result, additional data and/or labeling changes may be required for products containing piperonyl butoxide.

Should you wish to add/retain a reference to the company's website on your label, please be aware that the website becomes labeling under FIFRA and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR §156.10(a)(5) lists examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not be substantially differ from those claims approved through the registration process. Therefore, should the Agency find, or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA-approved registration, the website will be referred to EPA's Office of Enforcement and Compliance Assurance (OECA). As an alternative, you may refer consumers to the company's phone number or e-mail address.

A copy of your label stamped "Accepted with Comments" is enclosed for your records. Please submit two (2) copies of the final printed labeling, incorporating the above changes, before releasing the product for shipment. If these conditions are not complied with, the registration will be subject to cancellation in accordance with section 6(e) of FIFRA. Your release for shipment of the product bearing amended labeling constitutes accepting of these conditions.

If you have any questions about this label review, please contact Mr. Carmen J. Rodia, Jr. at (703) 306-0327 or via e-mail at Rodia.Carmen@epa.gov.

Sincerely Yours,



Richard J. Gebken
 Product Manager (10)
 Insecticide Branch
 Registration Division (7505P)

[] indicates optional statements

RF 9910 AEROSOL

**Alternate Brand Names: ZODIAC® Multi-Purpose Home & Insect Spray
ZODIAC® Advanced Indoor Insect Spray
Vet Kem® Siphotrol® Plus II Premise Spray
Precor® 2000™ Plus Premise Spray**

- Treats 2000 square feet (16 oz.)
- Contains the Synthetic Pyrethroids **PERMANONE™** and **Sumithrin™**
- Contains PRECOR® Insect Growth Regulator *Plus* adulticides
- Contains [With][Plus] PRECOR® [VIGREN™] Insect Growth Regulator [IGR] Kills Flea Eggs
- Synergized to keep killing fleas
- Stops hatching [flea] eggs (larvae) from developing into adult fleas for 210 days [30 weeks][7 months]
- Controls fleas, tick
- Kills [Controls] both adult and preadult (larvae)[eggs] fleas
- Kills both adult and immature fleas & ticks
- Keeps killing adult fleas for 10 to [up to] 14 days including those emerging from the pupa
- Fast-acting formula
- Kills preadult (larvae) fleas before they grow up to bite
- Leaves no lingering odor (bad smell), no stains, no sticky mess
- Effectively breaks the flea life cycle
- For Use in the Home/Garage/Kennel to Control Fleas, Ticks
- Use on carpets, rugs, upholstery, drapes & other places where fleas may hide
- For Use in Apartments, Homes, Garages, Automobiles, and Kennels, On Pet Bedding, Furniture, and Other Inanimate Objects Infested with Fleas & Ticks
- For use in: Hospitals, Hotels, Motels, Offices, Schools, Supermarkets, Transportation Equipment (Buses, Boats, Ships, Trains, Trucks), Warehouses, Utilities, Veterinary Clinics and ~~Other~~ Commercial and Industrial Buildings
- [Convenient] Easy to Apply [water-based][aerosol] Reduces hand fatigue
- Prevents Reinfestation and Flea Build-Up for 210 Days [30 weeks][7 months]
- Protects for [7 months][30 weeks][210 days]
- Carpet-penetrating formula that does not leave fleas a place to hide
- Contains no CFC or other ozone-depleting substances. Federal regulations prohibit CFC propellants in aerosols.
- [Kills][100% knock down for] adult fleas in 10 minutes and 90% residual control after 10 days
- 100% knock down of ticks in 24 hours
- Kills flea eggs to prevent reinfestation
- Kills ticks []

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(FRONT OR BACK PANEL)

ACTIVE INGREDIENTS:

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OTHER INGREDIENTS*:	95.865%
TOTAL:	100.000%

*Contains petroleum distillates

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

See back panel for additional precautionary statements

EPA Reg. No. 2724-490
Net Contents:

**ACCEPTED
With COMMENTS
In EPA Letter Dated:**

EPA Est. No.

December 5, 2008
Under the Federal Insecticide, Fungicide
and Rodenticide Act, As amended, for the
pesticide Registered under EPA Reg. No:

2724-490

4/5

RF 9910 aerosol kills adult fleas, hatching flea eggs, flea larvae, and ticks. PRECOR®, [VIGRen®] [S-methoprene], the unique ingredient in [Brand Name] provides 7 months' [210 days'] [30 weeks'] ~~[a full season's]~~ protection by preventing eggs from ever developing into biting fleas. For best results, use [Brand Name] aerosol with [Brand Name] on-animal products for complete control of fleas and ticks.

**READ ENTIRE LABEL BEFORE USE.
NOT FOR USE ON HUMANS OR PETS.**

DIRECTIONS FOR USE: It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

SHAKE WELL BEFORE USING

FOR USE IN THE HOME/GARAGE/KENNEL

1. **Identify treatment areas**, especially those where pets frequent, such as in and around pet's sleeping and resting areas. These are the primary areas where fleas, their eggs, and ticks are found. Before treatment, make a test application to upholstery, drapery, light-colored, delicate fabrics, or wood surfaces in an inconspicuous place.
2. **Prepare treatment areas**. Cover all food processing surfaces and utensils during treatment or thoroughly wash after product use. Cover or remove exposed food. Remove pets, and cover and unplug aquariums before spraying. Remove motor vehicles before using in garages. For best results with Surface/Carpet treatments, vacuum thoroughly before spraying and discard vacuum bag in outside trash. This product may also be used for infested surfaces inside motor vehicles.
3. **Apply treatment**. For [light] flea/tick infestations, a single can (16 oz./8 oz.) treats 2000/1000 square feet. [For established flea [tick] infestations and for continued control of fleas [ticks] for 10 to [up to] 14 days, a single can (16 oz./8 oz.) treats 500/250 square feet.] Hold container upside down 2-3 feet from surface, point actuator towards the surface and push button. Using a sweeping motion, apply a light uniform spray to all surfaces of furniture, rugs, carpets, drapes, and around all pet resting areas. Avoid thoroughly wetting surfaces. Mist treated areas only until "slightly damp". Do not over-treat. Reapply in 14 days, if necessary. **IMPORTANT:** Only complete and proper application to carpets, upholstery, drapes, and other fabrics will provide thorough flea [tick] elimination. Keep children and pets out of areas during treatment. Vacate room after treatment, and ventilate until surfaces are dry before reoccupying.
4. For best results, eliminate fleas/ticks on your pet with appropriate [Brand Name] on-animal products.

FOR USE IN: Hospitals, Hotels, Motels, Offices, Schools, Supermarkets, Transportation Equipment (Buses, Boats, Ships, Trains, Trucks), Warehouses, Utilities, Veterinary Clinics and Other Commercial and Industrial Buildings

1. **Prepare Treatment Areas**. For best results with Surface/Carpet treatments, vacuum thoroughly before spraying and discard vacuum bag in outside trash. Test in an inconspicuous area before treating. Cover all food processing surfaces and utensils during treatment or thoroughly wash after product use. Cover or remove exposed food. Keep children and pets out of areas during treatment. Cover and unplug aquariums before spraying. Vacate room after treatment, and ventilate until surfaces are dry before reoccupying.
2. **Apply Treatment**. For [light] flea/tick infestations, a single can (16 oz./8 oz.) treats 2000/1000 square feet. [For established flea [tick] infestations and for continued control of fleas [ticks] for 10 to [up to] 14 days, a single can (16 oz./8 oz.) treats 500/250 square feet.] Hold container upside down 2-3 feet from surface, point actuator towards the surface and push button. Using a sweeping motion, apply a light uniform spray to all surfaces of furniture, rugs, carpets, drapes, and around all pet resting areas. Avoid thoroughly wetting surfaces. Mist treated areas only until "slightly damp". Do not over-treat. Reapply in 14 days, if necessary. **IMPORTANT:** Only complete and proper application to carpets, upholstery, drapes, and other fabrics will provide thorough flea [tick] elimination.

STORAGE and DISPOSAL: **Storage:** Store in a cool dry area. Do not transport or store below 32° F. **Disposal:** Do Not Puncture or Incinerate! **If empty:** Place in trash or offer for recycling, if available. **If partly filled:** Call your local solid waste agency for disposal instructions.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS - CAUTION: Avoid contact with skin or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

FIRST AID	
IF ON SKIN OR CLOTHING	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
IF SWALLOWED	<ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Do not induce vomiting unless told to do so by a poison control center or doctor. • Do not give ANY liquid to the person. • Do not give anything by mouth to an unconscious person.
<p>In case of emergency, call [phone number] or a poison control center. Have the product container or label with you when calling a poison control center or doctor or going for treatment.</p>	
<p>NOTE TO PHYSICIAN/VETERINARIAN: Contains petroleum distillates – vomiting may cause aspiration pneumonia.</p>	

PHYSICAL OR CHEMICAL HAZARDS: Contents under pressure. Do not use or store near heat or open flame. Do not puncture or incinerate container. Exposure to temperatures above 130° F may cause bursting.

Seller makes no warranty, expressed or implied, concerning the use of this product other than indicated on the label. Buyer assumes all risk of use and handling of this material when such use and handling are contrary to label instructions.

For product use information or in case of emergency, call [phone number].

PRECOR® Insect Growth Regulator, Vet Kem® Siphotrol®, Zodiac® and vIGRen® Insect Growth Regulator are registered trademarks of Wellmark International. PERMANONE™ is a trademark of AgrEvo Environmental Health. Sumithrin™ is a trademark of McLaughlin Gormley King Company

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