Memorandum

Date: 15 September 1982

Subject: EPA Reg. No. 2724-287 ZOECON RF-178 FOGGER
Caswell #28AAA

From: B. T. Backus
IRB/TSS

To: Mr. Franklin Gee
Product Manager 17

Registrant: Zoecon Industries
12200 Denton Drive
Dallas, TX 75234

Active Ingredient:
Methoprene........................................0.15%
Inert Ingredients:....................................99.85%

Background:

The registrant is proposing a change in signal word from WARNING to CAUTION. The signal word WARNING was originally prescribed for this product on the basis of eye irritation potential, since reversible (within 7 days) corneal opacity was observed in some rabbit eyes following exposure to this product. Since that time Policy and Criteria Notice 2161.2 (March 31, 1981) has revised the toxicity categorization by these effects from toxicity category II to III.

Comments and Recommendations:

1. We can accept a change in the signal word from WARNING to CAUTION, provided the additional labeling revision indicated below is made.

2. The statement "May cause eye irritation." should be added to the Hazards to Humans and Domestic Animals statement immediately preceding "Avoid contact with skin, eyes or clothing."

Byron T. Backus
IRB/TSS