

Memorandum

Date: 27 August 1982

Subject: EPA File Symbol: 4758-RUU HILL'S HOLIDAY FLEA AND TICK DIP WITH NATURAL INSECTICIDE Caswell # 526

From: B. T. Backus  
IRB/TSS

To: Mr. William Miller  
Product Manager 16

Applicant: Pet Chemicals Inc.  
P.O. Box 660656  
7781 N.W. 73 CT  
Miami Springs, FL 33166

Active Ingredient:  
d-Limonene.....78.20%  
Inert Ingredients:.....21.80%

Background:

Product is proposed for use, after dilution, on dogs, cats, puppies, kittens etc. for control of ticks and fleas.

Comments and Recommendations:

1. This product is probably in toxicity category III with respect to potential oral and eye exposure hazard, and should be labeled accordingly.
2. IRB/TSS would have no objection, on the basis of hazard to humans and domestic animals, to the conditional registration of this product for the proposed uses with the labeling revisions as indicated below.

Labeling:

1. There should be a Statement of Practical Treatment (preferably under that heading) something like:

If swallowed: Call a physician or Poison Control Center. Give milk or water, but do not induce vomiting except under medical supervision because of aspiration hazard. Do not give anything by mouth to an unconscious person.

If in eyes: Flush with plenty of water. Get medical attention if irritation persists.

2. The label should state that this product should not be used on animals of under one month of age. While the pesticide itself would probably not harm the kitten or puppy, the possibility exists that the animal's mother might react adversely to any change in a familiar odor. The "For Dogs, Cats, Kittens and Puppies" should then be revised to something like: For Dogs, Cats and Kittens and Puppies over one month old."
3. The Hazards to Humans and Domestic Animals statement should include: "May be harmful if swallowed," (we can accept: "Concentrate is harmful if swallowed.") as well as "May cause eye irritation."
4. Directions for use specify a dilution rate of two tablespoons to 1 quart of water. This is not the same dilution as 1 1/2 oz (3 tablespoons) to 1 gallon of water, and there should be a revision to make the recommended dilution rate constant.
5. The word "safely" ("May be used safely in conjunction with...") must be deleted.

*Byron T. Backus 08/30/82*

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