



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

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

August 11, 2009

Mr. Robert Rosenwasser,  
Director, Regulatory Affairs  
The Hartz Mountain Corporation  
400 Plaza Drive  
Secaucus, NJ 07094-3688

**Subject: Amended Labeling, Response to EPA Letter Dated July 8, 2009  
Hartz® 2 in 1® Flea & Tick Killer for Carpets, EPA Reg. No. 2596-138  
Your E-Mail Submission Dated August 4, 2009**

Dear Mr. Rosenwasser:

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 label revision provision(s):

General Statement:

1. Delete all text throughout the label marked with "~~strikethrough~~."

The Hartz Mountain Corporation should note that a notice of availability of EPA's RED for products containing pyrethrins was published in the *Federal Register* on July 26, 2006 (Volume 71, Number 143, Pages 42387-42389). In addition, EPA's RED 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 pyrethrins and 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 section 12(a)(1)(E) of FIFRA. 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.

2/7

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](mailto:Rodia.Carmen@epa.gov).

Sincerely Yours,

Handwritten signature of Richard J. Gebken in black ink. The signature is cursive and includes a small mark to the left that looks like "TOP".

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

*Enclosure: Label stamped "Accepted with Comments"*

002596-00138 D418331

# Hartz® 2 in 1® Flea & Tick Killer for Carpets

## Alternate Brand Names

- Hartz® UltraGuard® Flea & Tick Dog Powder
- Hartz® UltraGuard® Dog Powder
- Hartz® UltraGuard® Flea & Tick Cat Powder
- Hartz® UltraGuard® Cat Powder
- Hartz® UltraGuard® Flea & Tick Carpet Powder
- Hartz® 2 in 1™ Rid Flea Carpet Powder

<b>ACTIVE INGREDIENTS:</b>	(By Weight)
Pyrethrins.....	0.10%
Piperonyl butoxide, technical*.....	1.00%
<b>OTHER INGREDIENTS</b> .....	<u>98.90%</u>
<b>TOTAL</b> .....	100.00%

\*Equivalent to 0.080% (butylcarbityl)(6-propylpiperonyl) ether and 0.020% related compounds.

## KEEP OUT OF REACH OF CHILDREN

### CAUTION

See (back) ~~(side)~~ panel ~~(s)~~ for additional precautionary statements.

**NET CONTENTS** \_\_\_\_\_ oz (\_\_\_\_ g)

EPA Reg. No. 2596-138  
EPA Est. XXXX-XX-XXX

Made (in the USA) for The Hartz Mountain Corporation, 400 Plaza Drive, Secaucus, NJ 07094

ACCEPTED  
With COMMENTS  
In EPA Letter Dated:  
*August 11, 2009*  
Under the Federal Insecticide, Fungicide  
and Rodenticide Act, As amended, for the  
pesticide Registered under EPA Reg. No:  
2596-138

**PRECAUTIONARY STATEMENTS****HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

**CAUTION:** Harmful if inhaled, swallowed, or absorbed through skin. Avoid breathing of dust. Avoid contact with skin, eyes, or clothing. Wash hands thoroughly with plenty of soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Obtain medical attention if irritation persists. Avoid contamination of food and feedstuffs. Apply this product only as specified on the label. Do not apply to (use on) kittens less than twelve (12) weeks old. ~~Flush eyes with plenty of water. If irritation persists, get medical attention. Do not contaminate food, water or feed. Do not use in food serving areas while food is exposed. Food processing surfaces and utensils should be covered or thoroughly washed after treatment. Cover aquariums before use.~~

**ENVIRONMENTAL HAZARDS**

Environmental Hazards: This product is toxic to aquatic organisms, including fish and invertebrates. Do not contaminate water when disposing of equipment wash-waters or rinsate. See Directions for Use for additional precautions and restrictions.

**FIRST AID**

<b>FIRST AID</b>	
<b>If Inhaled:</b>	<ul style="list-style-type: none"> <li>• Move person to fresh air.</li> <li>• If person is not breathing, call 911 or and ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.</li> <li>• Call a poison control center or doctor for further treatment advice.</li> </ul>
<b>If on Skin or Clothing :</b>	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>If in Eyes:</b>	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison center or doctor for treatment advice.</li> </ul>
<b>If Swallowed:</b>	<ul style="list-style-type: none"> <li>• Call a poison control center or doctor immediately for treatment advice.</li> <li>• Have person sip glass of water if able to swallow.</li> <li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
<p>Have the product container or label with you when calling a poison control center or doctor, or going for treatment. <b>For additional information on this pesticide product (including health concerns, medical emergencies, or pesticide incidents), you may call 1-800-275-1414.</b></p>	

## **DIRECTIONS FOR USE**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

## **READ ENTIRE LABEL BEFORE EACH USE**

### **General Precautions and Use Restrictions**

- Apply this product only as specified on this label.
- Do not allow adults, children, or pets to enter treated area until dusts have settled.
- Except when applying directly to pets, do not apply this product in a way that will contact adults, children or pets, either directly or through drift.
- Do not apply to pets less than 12 weeks old.
- Consult a veterinarian before applying this product on medicated, debilitated, aged, pregnant, or nursing animals.
- Sensitivities may occur after using ANY pesticide product for pets. If signs of sensitivity occur, bathe your pet with a mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately.
- Remove pets, birds, and cover aquariums before spraying application.
- Remove and cover exposed food and drinking water before application.
- Remove or cover dishes, utensils, food processing equipment and food preparation surfaces, or wash them before use.
- Keep children and pets off carpets and upholstered furniture during treatment and until area is vacuumed.

### **FOR USE ON CARPETS\***

1. Apply to dry surfaces only. Do not allow powder to become wet.
2. If powder adheres to a spot, brush it out and vacuum immediately.
3. Hold can upside down and shake powder onto carpet.
4. Wait 60 minutes and then vacuum (using a new vacuum bag).
5. For severe problems, wait 2-3 hours before vacuuming.
6. Remove bag from vacuum cleaner and immediately discard in the trash.
7. Reapply every 7 days (if necessary).

\*Test on hidden surface of carpet before using to ensure texture or color is not affected.

### **FLEA CONTROL FOR (CATS) (&) (DOGS)**

### **READ ENTIRE LABEL BEFORE EACH USE.**

6/7

## **USE ONLY ON (DOGS) (AND) (CATS).**

Apply to your pet while outdoors or in a well-ventilated area to avoid breathing airborne dust. Pets may be bathed and groomed 4 hours after treatment to remove remaining product.

1. Hold can upside down and sprinkle powder over pet's back, from head to tail. Keep out of pet's eyes and face.
2. Rub in until powder penetrates to skin covering around the neck and ears, the stomach, legs and the base of the tail.
3. Reapply every 7 days (if necessary).

## **FOR PET LIVING QUARTERS**

1. Treat pet bedding and sleeping area by liberally using 15-20 "sprinkles" (approximately 1 ounce) over a 50 sq. ft. area.
2. Let sit for 4 hours.
3. Vacuum or sweep-up and discard immediately.
4. Reapply every 5 to 7 days (if necessary).

## **STORAGE AND DISPOSAL**

Do not contaminate water, food or feed by storage or disposal. **Pesticide Storage:** Store in a cool, dry place that is inaccessible to children. **Container Disposal: If empty:** Nonrefillable container. Do not refill or reuse this container. Offer for recycling, if available. **If partly filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

## **OPTIONAL/ALTERNATE TEXT**

Kills (fleas) (ticks) (lice) (and) (ants) that live and breed in carpets.  
Kills fleas, ticks, lice and ants  
Kills (fleas) (ticks) (lice)  
Kills (Fleas) (&) (and) (Ticks) (through contact)  
Kills (fleas) (and) (ticks)  
(Starts) Killing (through) contact  
Kills (through) contact

2/1

**NON-PESTICIDAL RELATED CLAIMS AND OTHER OPTIONAL  
TEXT**

Sprinkle & Vacuum

For use in (homes) (basements) (pet sleeping quarters) (and) (storage areas)

Easy to use

Sprinkle, (brush), (wait 60 minutes) (and) vacuum

400 sq. ft. coverage

Fresh Scent

HOME TREATMENT

Carpet Insecticide & Freshener

Filled by weight, not by volume. Some settling may occur

Hartz® and other trademarks are trademarks of The Hartz Mountain Corporation.

For more information, call our experts at xxx-xxx-xxxx

Visit (our website) ([www.hartz.com](http://www.hartz.com)) ([www.hartzultraguard.com](http://www.hartzultraguard.com))

Hartz (brand name) products are designed to compliment each other in an integrated program for flea and tick management. To assure proper treatment, we recommend use of only Hartz (brand name) products.

As with all flea and tick products, they are most effective when used as part of a total program aimed at reducing fleas and ticks in the (dog's) (cat's) (pet's) environment

A single female flea can lay [an average of] 25 eggs per day [on average]

Complete your preventative program with products that kill both adult and pre-adult fleas.

(Complete your defense against fleas (with) (two) ingredients targeted at (killing fleas) (breaking the flea life cycle)

Be sure to treat the animal's bedding and surroundings with (a) product(s) registered for these uses, such as Hartz (brand name) line (products)