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MAR 31 1987

Mr. Sidney K. Saksenberg
CSA Chemical Company
P.O. Box 690347
Houston, TX 77269-0347

Dear Mr. Saksenberg:

Subject: New Updated Label/Alternate Formulation
Omni Flea & Tick Powder Formula #5
EPA Registration No. 43288-10
Your Amended Application Dated August 5, 1986

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable provided that you make the labeling changes listed below before you release the product for shipment bearing the amended labeling:

- 1. We suggest the following statement:

STATEMENT OF PRACTICAL TREATMENT

If Swallowed - Call a physician or Poison Control Center immediately. Drink one or two glasses of water and induce vomiting by touching the back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person.

If Inhaled - Remove victim to fresh air. Apply artificial respiration if indicated.

If On Skin - Remove contaminated clothing and wash affected areas with soap and water.

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		CONCURRENCES					
SYMBOL	ORIGINATOR						
SURNAME							
DATE							

If In Eyes - Flush eyes with plenty of water.
Call a physician if irritation
persists.

2. Delete the statement, "Keep out of lakes, streams, etc. . . ." and replace with the statement "Do not apply directly to any body of water" in the Environmental Hazards section.
3. For the product chemistry requirements, you must provide the following information:
 - a. Analytical Methods - provide the methods used to analyze for the active ingredients. If you are referencing the data, you must provide the Accession Number(s).
 - b. Storage Stability - the formulated product must be analyzed for its active ingredient at time zero and during a year of storage. These data must be submitted within 14 months from the date of this letter.

Note: For the storage stability study you cannot reference the concentrate you are using to formulate your product.
 - c. Provide the upper and lower certified limits based on the pure active ingredients, for the product chemistry.
4. Submit five (5) copies of your final printed labeling before you release the product for shipment.

There is no objection to the use of the alternate formulation requested in your letter of the above date. The amendment has been inserted in the file for the subject product.

A stamped copy of the labeling is enclosed for your records.

Sincerely yours,

George T. LaRocca
Product Manager (15)
Insecticide-Rodenticide Branch
Registration Division (TS-767C)

Enclosure

Reg no: 43288-10

PM-15

Kills Fleas, Ticks & Lice on Cats and Dogs
Fast Acting
Lasts Seven Days
Reduces Itching and scratching caused by insect bites.

DIRECTIONS FOR USE

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

To kill fleas, ticks and lice and to reduce itching and scratching due to insect bites, dust entire animal beginning at back and working toward the head. Make sure to dust the legs, paws and between the toes. Dust animal's bedding and sleeping quarters regularly. Repeat at weekly intervals if necessary.

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

CAUTION

Harmful if swallowed. Avoid breathing dust. Do not get in eyes, on skin or on clothing. If material gets in eyes, flush with plenty of water. If irritation persists, see Physician. Wash thoroughly with soap and water after handling and before smoking or eating. Avoid contamination of feed and food stuffs.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Keep out of lakes, streams and ponds. Do not contaminate water by disposal of wastes. Apply this product only as specified on this label.

STATEMENT OF PRITICAL TREATMENT

IF SWALLOWED: Induce vomiting with fingers to back of throat. Call Physician.
IF ON SKIN: Wash with soap and water.
IF IN EYES: Flush with plenty of water. Call Physician.

DISPOSAL

Do not reuse empty container. Wrap container in newspaper and put in trash collection.

EPA Reg. No. 43288-10
EPA Est. No. 43288-TX-1

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**OMN
FLEA & T
POWDER
Formula
For Use on Cats**

ACTIVE INGREDIENTS:
2-Chloro-1,2,4,5-tetrachlorophenyl
3-methyl-4-isobutyl
INERT INGREDIENTS:

**KEEP OUT OF REACH OF
CAUTION**
See Back Panel for
Precautionary Statements

NET WEIGHT: 6

**ACCEPTED
WITH COMMENTS
by EPA Letter 1/27/87**

MAR 31 1987

Under the
Federal
Insecticide
Act
No. 43288-10
Registered under EPA Reg. No.
43288-10

Made by
CSA Ltd., Inc.
Houston, Texas