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PETITION OR EXP. PERMIT NO. _____

DATE DIV. RECEIVED September 18, 1989DATE OF SUBMISSION September 13, 1989

DATE SUBMISSION ACCEPTED _____

TYPE PRODUCT(S): (I), D, H, F, N, R, S _____

DATA ACCESSION NO(S). 412382-01
412382-02; Record Number: 252175; Action Code: 305
412382-03PRODUCT MGR. NO. 15-LaRoccaPRODUCT NAME(S) Hartz® Blockade® for DogsCOMPANY NAME The Hartz Mountain CorporationSUBMISSION PURPOSE Provide performance data obtained according to a
company devised protocol in support of claims of
toxicity to and repellency of deer tick on dogs.CHEMICAL & FORMULATION N,N-Diethyl-m-toluidide 8.55%
Other isomers 0.45%
Cyano (3-phenoxyphenyl) methyl-4-chloro-alpha-
(1-methylethyl) benzeneacetate 0.09%
(non-aqueous pressurized liquid spray, 7 or 13 fl. oz.)

CONCLUSIONS & RECOMMENDATIONS The data presented in EPA Accession (MRID) Number 412382-01, having been obtained according to a company devised protocol which incorporates all essential requirements of § 95-9(a)(2) and (3) on p. 263 and meets the standard of § 95-9(b)(2)(i) on p. 264 of the Product Performance Guidelines, are adequate to demonstrate the effectiveness of the subject product in repelling and killing the deer tick, *Ixodes dammini*, the carrier of Lyme disease, when applied according to label directions. The data presented in MRID Number 412382-02, having been obtained according to a company devised protocol which incorporates essential requirements of § 95-9(a)(3) on p. 264 of the Guidelines, are adequate to demonstrate the effectiveness of the subject product as a repellent to the deer tick on dogs when applied according to label directions. The data presented in MRID Number 412382-03, having been obtained according to a company devised protocol which incorporates essential requirements of § 95-9(a)(2) and (3) on p. 263 and meets the standard of § 95-9(b)(2)(i) on p. 264 of the Guidelines, are adequate to demonstrate the effectiveness of the subject product in killing the deer tick on dogs when applied according to label directions. The data indicate that the *in vitro* method overestimates the amount of spray required per pound of animal body weight by about 5% when applied as a repellent but underestimates the amount required when applied as a toxicant by about 23%. Also, the "2 seconds per pound of body weight" overestimates the time to cover a shorthaired animal and underestimates the time to cover a longhaired animal but neither is significant.

RL Varn L. McFarland, IRB