

270-218

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January 3, 1996

CERTIFIED MAIL (111112)

Farnam Companies Inc.  
301 West Osborn  
Phoenix, AZ 85013-3928

Attention: Mr. Leland Veith

Subject: Flys-Off Insect Repellent for Dogs  
EPA Registration No. 270-218  
Your letter of July 15, 1992  
Submission of Revised Confidential Statement of Formula  
(CSF) and Labeling

On the above date, you submitted a revised CSF and labeling. At that time we did not review the CSF and labeling. A review of the administrative history of this product shows that the Agency most recently provided comments on a CSF on July 16, 1991 (five years ago) and on a label on May 14, 1979 (17 years ago). Therefore, we have reviewed and provided comments on your most recently submitted CSF and Label for this product in order that you can bring both documents up to current standards.

A. Review of CSF

The Agency has determined that the CSF, dated July 13, 1992, which was submitted with the above amendment in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable, provided that you make the following change:

1. The third ingredient on your CSF must be declared as "active", not "inert", as indicated on Page 24 of the Rotenone Standard.

A copy of this CSF has been placed in our file for this product. All previous versions are obsolete. Please submit a copy of the revised CSF for our files.

B. Review of Label

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable provided that

you make the following changes and submit one (1) copy of revised labeling to us before you ship product:

*new comment*

- 1. As indicated on Page 24 of the Rotenone Standard, the ingredient statement for products must list the actives as:

ACTIVE INGREDIENTS

Rotenone . . . . .	_____ %
Other Associated Resins . . . . .	_____ %

- 2. Revise your PRECAUTIONARY STATEMENTS as follows:

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

WARNING

Causes substantial but temporary eye injury. Do not get in eyes, on skin or on clothing. Wear safety glasses. Harmful if swallowed. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

Do not spray food, feed, serving or cooking utensils.

FIRST AID

IF IN EYES: Hold eyelids open and flush with a steady gentle stream of water for 15 minutes. Get medical attention.

IF ON SKIN: Wash with plenty of soap and water. Get medical attention if irritation persists.

IF SWALLOWED: Call a physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching finger to back of throat. Do not induce vomiting or give anything by mouth to an unconscious person.

Environmental Hazards

This product is extremely toxic to fish. Do not apply directly to water. Do not contaminate water when disposing of equipment washwaters.

Physical or Chemical Hazards

EXTREMELY FLAMMABLE . . . , cause explosion.

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The above statements are based upon an eye irritation study (Toxicity Category II) and dermal irritation study (Toxicity Category III) that were reviewed on November 14, 1977 and an assumption that the acute oral was at least Toxicity Category III. We found no records of any other acute toxicity studies conducted on this product.

Because the product only contains 7.6% Petroleum Distillates, it would not appear to present an aspiration hazard. However, you may wish your company toxicologist to advise you on this aspect of your precautionary labeling.

Also, in view of the wide mixture of active and inert ingredients in this product, your company may wish to conduct some additional acute toxicity tests to refine the precautionary statements and avoid any product liability based on the lack of acute toxicity testing that currently exists for this product.

- 3. Revise your use directions as follows:

DIRECTIONS FOR USE

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

Use Restrictions

To repel flies, gnats, and mosquitoes from dogs and from non-food/non-feed surfaces. DO NOT USE ON PUPPIES OR KITTENS LESS THAN 4 WEEKS OLD. DO NOT APPLY ON OPEN CUTS OR SORES.

Application Directions for Dogs

Hold container 8 to 10 inches from dog and lightly spray on back, underside, legs, back of neck, base of tail, and inside and outside ears. If hissing noise disturbs dog during ear application, mist cotton swab and rub product on ear surfaces. Repeat application when needed.

Application Directions for Surfaces

Hold container 8 to 10 inches from non-food/non-feed surfaces such as picnic tables, bird cages, cat litter trays, kennels, and pet bedding where insects rest. Repeat application when needed.

4. Revise your "Storage and Disposal" Statement as follows:

Storage and Disposal

Storage: Store only in a cool, dry place away from heat and sunlight and inaccessible to children and pets.

Disposal: When empty, replace cap, securely wrap in newspaper, and discard in trash. Do not incinerate or puncture.

5. At your option, you may wish to change your product name to "FLYS-OFF Insect Repellent for Dogs and Non-food/Non-feed Surfaces" as it more completely describes the use pattern of the product.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

You will have 18 months from receipt of this letter to begin using the revised labeling. If you have questions about this letter, please contact Mr. Dan Peacock at 703-305-5407.

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

Sincerely yours,

*RF For*

Robert A. Forrest  
Product Manager (14)  
Insecticide-Rodenticide Branch  
Registration Division (H7504C)

**SENDER:** Complete items 1, 2, 3 and 4.  
Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check boxes for service(s) requested.

1.  Show to whom, date and address of delivery  
2.  Restricted Delivery

3. Article Addressed to:  
Farnam Cos., Inc.  
301 W. Osborn  
Phoenix, AZ 85013-3928  
Attn: Mr. Deland Verik

4. Type of Service:  
 Registered  Insured  
 Certified  COD  
 Express Mail

Article Number: 8324-91-1111  
PB 24-752

PS Form 3811, July 1983 447-845

FARNAM  
PET PRODUCTS

FLYS-OFF  
INSECT REPELLENT FOR DOGS

ACCEPTED  
DOCUMENTS  
in EPA Letter Dated

JAN 03 1996

ACTIVE INGREDIENTS:

BUTOXPOLYPROPYLENE GLYCOL .....	17.589%
ROTENONE .....	0.084%
TECHNICAL PIPERONYL BUTOXIDE* .....	0.375%
PYRETHRINS .....	0.136%
INERT INGREDIENTS: .....	81.816%

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act  
as amended, for the pesticide  
registered under EPA Reg. No.  
270-248

\* EQUIVALENT TO 0.3% (BUTYLCARBITYL)(6-PROPYLPIPERONYL)  
ETHER AND 0.075% RELATED COMPOUNDS

KEEP OUT OF REACH OF CHILDREN

WARNING

See additional cautions on back label

NET WEIGHT: 9 OZ. (255 g)

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**FLYS-OFF**  
Insect Repellent For Dogs

**PROTECTS FROM FLIES      GNATS      MOSQUITOES**

Contains no CFC's or other ozone depleting substances. Federal regulations prohibit CFC propellants in aerosols.

**PRECAUTIONARY STATEMENTS**  
**HAZARDS TO HUMANS & DOMESTIC ANIMALS**  
**WARNING**

Avoid spraying toward eyes. In case of contact, immediately flush eyes with plenty of water. Get medical attention if irritation persists. Do not spray food, feed, serving or cooking utensils. Do not use on puppies or kittens less than 4 weeks old.

**PHYSICAL OR CHEMICAL HAZARDS**

**EXTREMELY FLAMMABLE.** Do not use or store near fire, sparks, or heated surfaces. Turn off pilot lights in gas appliances and unplug or turn off electrical equipment in the use area. After airing out phase in completed, relight pilot lights and reconnect electrical current. Do not smoke in the use area. Contents under pressure. Do not puncture or incinerate container. Exposure to temperatures above 130 degrees F may cause bursting. Incineration or container may cause explosion.

**DIRECTION FOR USE**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Hold container 8 to 10 inches from dog and lightly spray on back, underside, legs, back of neck, base of tail, inside and outside of ears. If hissing noise disturbs dog during ear application, mist cotton swab and rub on ear surfaces. Do not spray eyes or mouth. Surface Repellent: Spray on places where flies, gnats, or other insects gather such as picnic table, bird cage, cat litter tray, kennel, pet bedding. Repeat application when necessary.

**STORAGE AND DISPOSAL**

**STORAGE:** Store tightly closed in a cool dry place away from heat and sunlight.

**DISPOSAL:** Replace cap and discard container in trash. Do not incinerate or puncture.

EPA REG. NO. 270-218

EPA EST. NO. 11715-TN-1

CAT NO. 2509

Manufactured For: **FARNAM COMPANIES, INC.**

Phoenix, Arizona 85013