

270-279

1/19/2010

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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Ms. Cheryl Purcell
Farnam Companies, Inc.
301 West Osborn Road
Phoenix, Arizona 85013

JAN 19 2010

Dear Ms. Purcell:

Subject: Amendment- additional market claims
Farnam Purge Pesticide
EPA Registration Number 270-279
Your submission dated August 21, 2009

The application referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable with the following comments:

1. Delete ALL applicator claims. These claims are vague.
2. Change "Provides Tick Protection" to "Provides Tick Protection On Listed Pests".
3. Change "Repels [Ticks] [Mosquitoes] [On Horses]" to "Aids In the Control of Mosquitoes On Horses".
4. Delete "Lasting Protection Against Ticks [On Horses], "Continuous [Fly] And [Tick] Protection [For Horses]" and "Provides [Continuous][Lasting] Protection". No efficacy data was submitted or cited to substantiate these claims. These claims are vague.
5. Delete "Pleasant Scent [Smelling]. This is a subjective claim.
6. You cannot delete "Contains Petroleum Distillate". A new Confidential Statement of Formula was not submitted with this application changing the last acceptable basic Confidential Statement of Formula.
7. Under First Aid after "Have the product container or label with you when calling a poison control center or doctor, or going for treatment." add " a box "NOTE TO PHYSCIAN: Contains petroleum distillate. Vomiting may cause aspiration pneumonia.". A new Confidential Statement of Formula was not submitted with this application changing the last acceptable basic Confidential Statement of Formula.

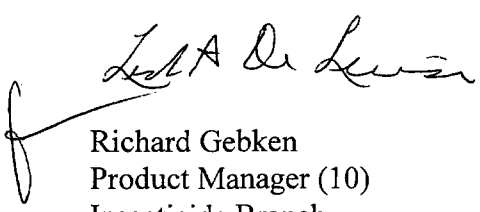
A copy of a stamped label is enclosed for your records.

2009

The enclosed note from George LaRocca dated September 15, 2008 explains your options concerning oil of citronella. Please respond to the Agency explaining how you will resolve the oil of citronella issue.

If you have any questions you may contact Linda A. DeLuise at 703.305.5428.

Sincerely yours,

A handwritten signature in cursive script that reads "Linda A. DeLuise". The signature is written in black ink and is positioned above the typed name of the sender.

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

Enclosure

3049

(Front)



(red)

FARNAM PURGE PESTICIDE

PLEASANT CITRUS SCENT

FLEA & TICK CONTROL FOR DOGS AND PUPPIES OVER 12 WEEKS OF AGE

PROTECTS HORSES FROM FLIES, GNATS, MOSQUITOES AND TICKS

DO NOT USE ON CATS

DOG/PUPPY CLAIMS

- KILLS & REPELS FLEAS UP TO 3 TO 4 WEEKS!
- KILLS AND REPELS MOSQUITOES!
- PROTECTS AGAINST BLOOD FEEDING MOSQUITOES (vector of HEARTWORM) UP TO 4 WEEKS!
- KILLS & REPELS TICKS FOR UP TO 4 WEEKS!
- KILLS & REPELS DEER TICKS (vector of LYME DISEASE) FOR UP TO 4 WEEKS!
- KILLS & REPELS BROWN DOG TICKS (*Rhipicephalus sanguineus*) FOR UP TO 3 TO 4 WEEKS!
- KILLS & REPELS AMERICAN DOG TICKS (*Dermacentor variabilis*) FOR UP TO 3 TO 4 WEEKS!
- MONTHLY APPLICATION!
- MONTHLY FLEA, TICK AND MOSQUITO TREATMENT!
- KILLS AND REPELS FLEAS AND TICKS FOR UP TO A MONTH!
- KILLS AND REPELS ADULT FLEAS FOR UP TO 3 TO 4 WEEKS!
- KILLS AND REPELS TICKS FOR UP TO [4 WEEKS] [3 TO 4 WEEKS] INCLUDING DEER TICKS (vector of LYME DISEASE), BROWN DOG TICKS & AMERICAN DOG TICKS!

HORSE CLAIMS

- PROTECTS HORSES FROM HOUSE FLIES, STABLE FLIES, FACE FLIES, HORN FLIES, EYE GNATS, AND TICKS
- KILLS & REPELS HOUSE FLIES, STABLE FLIES, FACE FLIES, HORN FLIES, EYE GNATS, AND TICKS ON HORSES
- AIDS IN THE CONTROL OF HORSE FLIES, DEER FLIES, MOSQUITOES AND BLACK FLIES ON HORSES
- SWEAT-RESISTANT SPOT-ON FOR HORSES
- SWEAT-RESISTANT [WATER-RESISTANT] FORMULA
- FIELD TESTED AND PROVEN EFFECTIVE EVEN WHEN HORSE SWEATS [GETS WET]

APPLICATOR CLAIMS

- [EASY TO USE] [NEXT GENERATION] APPLICATOR
- [NEXT GENERATION] PRECISION APPLICATOR
- EASY [SPOT ON] APPLICATOR
- [EASY TO USE] PRECISION APPLICATOR
- GOES ON RIGHT PRECISION APPLICATOR

REGISTERED
 AND CONTROLLED
 BY EPA Label Date
JAN 19 2010
 Under the Federal Insecticide,
 Fungicide, and Rodenticide Act
 as amended, for the pesticide
 registered under EPA Reg. No.
270-279

- EASY GRIP PRECISION APPLICATOR
- IMPROVED APPLICATOR
- EASY TO USE APPLICATOR

PRODUCT KILL/REPELLENT CLAIMS

- KILLS AND REPELS TICKS ON HORSES
- PROVIDES TICK PROTECTION
- WATER AND SWEAT RESISTANT [FORMULA]
- FIGHTS TICKS [ON HORSES]
- REPELS [BEES] [MOSQUITOES] [ON HORSES]
- PROTECTS AGAINST TICKS [ON HORSES]
- PROVIDES PROTECTION AGAINST TICKS [ON HORSES]
- KILLS TICKS [ON HORSES]
- PROTECTS HORSES FROM TICKS

DURATION CLAIMS

- LASTING PROTECTION AGAINST TICKS [ON HORSES]
- CONTINUOUS [FLY] AND [TICK] PROTECTION [FOR HORSES]
- PROVIDES [CONTINUOUS] [LASTING] PROTECTION
- ONE TUBE LASTS 14 DAYS [2 WEEKS]

MISCELLANEOUS CLAIMS

- WON'T SWEAT OFF
- STAYS ON THROUGH SWEAT AND RAIN
- SWEAT AND WEATHER PROOF
- WEATHER RESISTANT
- WEATHER PROOF
- IDEAL FOR PASTURED HORSES

SCENT CLAIMS

- PLEASANT SCENT [SMELLING]
- CITRUS SCENT

ACTIVE INGREDIENTS

| | |
|------------------------------------|--------|
| Permethrin* (CAS #52645-53-1)..... | 45.0% |
| OTHER INGREDIENTS** | 55.0% |
| TOTAL | 100.0% |

*cis/trans ratio: Max 55% (+) cis and min 45% (+) trans

** Contains Petroleum Distillate

KEEP OUT OF REACH OF CHILDREN
 CAUTION
 DO NOT USE ON CATS
 SEE BACK PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

509

Net Contents:

1 [.03 fl. oz. (1.0 ml)] [.05 fl. oz. (1.5 ml)] [1 fl. oz. (3.0 ml)] Applicator or 3 [.03 fl. oz. (1.0 ml)] [.05 fl. oz. (1.5 ml)] [1 fl. oz. (3.0 ml)] Applicators or
3 0.34 fl. oz. (10.0 ml)] Applicators or 6 [0.34 fl. oz. (10.0 ml)] Applicators

EPA Reg. No.: 270-279

EPA Est. No.: _____

Farnam Companies, Inc.
Horse Products Division
P.O. Box 34820
Phoenix, Arizona 85067-4820
www.farnam.com
Hours: 7 AM - 3:45 PM MST M-F
(lot number statements as needed)

Mfg. & Printed in U.S.A. (label revision number) (product number)

(Back)

READ ENTIRE LABEL BEFORE EACH USE
USE ONLY ON DOGS OR HORSES OVER 12 WEEKS OF AGE
DO NOT USE ON CATS

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
CAUTION

Cats which actively groom or engage in close physical contact with treated dogs may be at risk of serious effects.
May be toxic and potentially fatal if applied to or ingested by cats.

Hazards to Humans: Harmful if swallowed or absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse

Hazards to Domestic Animals: FOR EXTERNAL USE ON DOGS AND HORSES ONLY.
Do not use on puppies or foals under 12 weeks of age. Consult a veterinarian before using this product on debilitated, aged, medicated, pregnant, or nursing dogs or horses. Consult a veterinarian before using on dogs or horses with known organ dysfunction. DO NOT USE ON CATS or animals other than dogs or horses. Cats which actively groom or engage in close physical contact with treated dogs may be at risk of

serious harmful effect. Certain medications can interact with pesticides. It is advisable to consult a veterinarian before using this product with any other pesticide or drug.

| FIRST AID | |
|---|--|
| IF SWALLOWED | <ul style="list-style-type: none"> • Immediately call a poison control center or doctor. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give any liquid to the person. • Do not give anything by mouth to an unconscious person. |
| IF IN EYES: | <ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice. |
| IF ON SKIN OR CLOTHING: | <ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes • Call a poison control center or doctor for treatment advice. |
| In case of medical emergencies or health and safety inquiries, or in case of fire, leaking or damaged container or for product use information, call toll free: _____ | |
| Have the product container or label with you when calling a poison control center or doctor, or going for treatment. | |

Adverse Reactions: Some animals may be sensitive to ingredients in this product. Reactions in dogs or horses may include skin sensitivity. Dogs or horses may show lethargy, increased pruritus (itchiness), erythema (redness), rash and hair discoloration or hair loss at the application site. Observe the dog or horse following treatment. Sensitivity may occur after using ANY pesticide product on pets [animals]. If signs of sensitivity occur bathe your dog or horse with a mild, non-insecticidal shampoo and rinse with large amounts of water. If signs continue, consult a veterinarian immediately.

PHYSICAL OR CHEMICAL HAZARDS

DO NOT USE OR STORE NEAR HEAT OR OPEN FLAMES

ENVIRONMENTAL HAZARDS

This product is extremely toxic to fish. Do not add directly to water. Do not contaminate water when disposing of product or packaging.

DIRECTIONS FOR USE

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

DOGS

DO NOT USE ON CATS or animals other than dogs or horses. May be toxic or potentially fatal if applied to or ingested by cats. Do not get this product in your dog's eyes or mouth. Repeat applications may be made if necessary, but do not apply more often than once every 3 weeks, except to reapply after shampooing the dog.

For Dogs Weighing Less than 33 Pounds: [1.5 ml applicator tube] Apply one tube (1.5 ml) of product solution as a spot between the shoulder blades or as a stripe to the dog's back.

709

For Dogs Weighing More than 33 Pounds: [1.5 ml applicator tube] Apply one tube (1.5 ml) of product solution as a spot between the to the dog's shoulder blades or as a stripe to the dog's back and apply a second tube (1.5 ml) as a spot directly in front of the base of the tail or as a stripe to the dog's back.

For Dogs Weighing More Than 33 Pounds: [3.0 ml applicator tube] Apply approximately half of the tube (1.5 ml) of product solution as a spot or stripe to the dog's back between the shoulder blades and apply the rest of the tube's contents (1.5 ml) as a spot or stripe to the dog's back directly in front of the base of the tail. Or, apply the entire tube (3.0 ml) as a continuous stripe on the dog's back starting between the shoulder blades and ending directly in front of the base of the tail.

HOW TO APPLY:

FOR FOLDING CARD OR TABBED CARD UNIT-DOSE PACKAGING: Remove product tab by tearing along perforation. Holding tab with tube end pointed up and away from face and body, cut along dotted line. Invert tab over dog and use narrow end of card to part dog's hair. Squeeze tube firmly to apply all of the solution to the dog's skin. Wrap tab and put in trash.

FOR FLAT CARD (doubled) UNIT-DOSE PACKAGING: Separate cards along the perforated line. Holding separated card by its wide end with narrow end pointed up and away from face and body, cut along dotted line. Invert card over dog and use narrow end of the card to part dog's hair. Squeeze tube firmly to apply all of the solution to the dog's skin. Wrap card and put in trash.

FOR FLAT CARD UNIT DOSE PACKAGING: [for push pin type applicator] Remove one product tube from card. With cap end pointed up and away from face and body, depress cap to pierce tube end. Carefully remove cap, invert tube over dog, and with tube in close to dog's skin, squeeze tube to apply product. Wrap empty tube and put in trash.

BLISTER PACKED SARAN TUBES: Remove product tube from package. Holding tube with notched end pointing up and away from face and body, cut narrow end at notches. Invert tube over dog and use open end to part dog's hair. Squeeze tube firmly to apply all of the solution to the dog's skin. Wrap tub and put in trash.

PULL AND TWIST APPLICATOR TUBE: Remove applicator tube from package. Hold applicator tube in an upright position. Pull cap off tube. Turn the cap around and place other end of cap back on tube. Twist cap to break seal, then remove cap from tube. The dog should be standing for easy application. Part the hair, place the tip of the tube on the skin and gently squeeze to expel the solution on the skin. Discard empty tube as described in Storage and Disposal.

BLISTER CARD WITH TRI-LAYER TUBES: Remove product tube(s) from package. Fold along perforation between tubes and tear off one tube. (Return unused tubes to package.) Holding tube with notched end pointing up and away from fact and body, snap off narrow end at notches. Invert tube over dog and use open end to part dog's hair. Squeeze tube firmly to apply all of the solution to the dog's skin. Wrap tube and put in trash.

8029

**** FOR MULTI-DOSE PACKAGING:** Withdraw 1.5 ml of solution at a time. Apply entire given dose directly to the skin at the indicated locations.

**** FOR DROPPER BOTTLE MULTI-DOSE PACKAGING:** Insert dropper tube into insecticide solution, squeeze bulb and then release to fill tube barrel to 1.5 ml line. Position dropper tube end in dog's hair next to skin and squeeze to apply all of the solution to the dog's skin.

**** FOR SALE TO VETERINARIANS ONLY**

HORSES

**DO NOT USE ON HORSES INTENDED FOR FOOD USE
DO NOT USE ON FOALS UNDER 12 WEEKS (3 MONTHS) OF AGE**

Remove product tube(s) from package. [Fold along perforation between tubes and tear off one tube. Return unused tubes to package.] Holding tube with notched end pointing up and away from face and body, snap off narrow end at notches. Apply one tube (10.0 ml) of product solution as follows:

**Each line on applicator represents 2 ml of product
Horse diagram with ml markings appears here**

- 5 ml along the back line starting at the poll (top of head behind the ears), along the base of the mane, down the dorsal midline to the dock (base of the tail)
- 1 ml to the top of the forehead under the forelock
- 1 ml, as a stripe, to the back of each foreleg, from the ankle up to the knee (2 ml total)
- 1 ml, as a stripe, to the back of each hindleg, from the ankle up to the hock (2 ml total)
- Do not allow the product to contact horse's eyes or mucous membranes
- Wrap tube and put in trash
- Do not reapply for 14 days (2 weeks).

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.
Storage: Store in cool, dry place. Protect from freezing.
Disposal: If empty: Do not reuse container. Place in trash or 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.

FARNAM PURGE INSECTICIDE is an effective and easy to use product. FARNAM PURGE INSECTICIDE has demonstrated greater than 92% control of fleas within one day of application. As with all flea and tick control products, FARNAM PURGE INSECTICIDE should be used as part of a program aimed at reducing flea populations in the dog's environment (bedding, carpets, kennel, yard). Consult your veterinarian, entomologist, or retailer for program recommendations.

NOTICE OF WARRANTY

FARNAM COMPANIES, INC. MAKES NO WARRANTY OF MERCHANTABILITY, FITNESS FOR ANY PARTICULAR PURPOSE, OR OTHERWISE, EXPRESSED OR IMPLIED CONCERNING THIS PRODUCT OR

ITS USES WHICH EXTEND BEYOND THE USE OF THE PRODUCT UNDER NORMAL CONDITIONS IN ACCORDANCE WITH THE STATEMENTS MADE ON THIS LABEL.

Spot-on tube label

TUBE LABEL (folding card and flat card packaging designs)

FARNAM PURGE INSECTICIDE
{CAT ICON}

PERMETHRIN 45% W/W

KEEP OUT OF REACH OF CHILDREN
{DO NOT USE ON CATS}
READ DIRECTIONS AND
PRECAUTIONS BEFORE USING

EPA Reg. No. 270-279

{USE THIS STATEMENT AND/OR CAT ICON IN CIRCLE WITH SLASH}

Spot-on tab label

FARNAM PURGE INSECTICIDE
{CAT ICON}
PERMETHRIN 45% W/W

KEEP OUT OF THE REACH OF CHILDREN
{DO NOT USE ON CATS}
READ DIRECTIONS AND
PRECAUTIONS BEFORE USING

EPA REG. NO. 270-279

{USE THIS STATEMENT AND/OR CAT ICON IN CIRCLE WITH SLASH}