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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

July 8, 2010

Cheryl Purcell, Regulatory Specialist
Farnam Companies, Inc.
301 W. Osborn Road
Phoenix, AZ 85013

Subject: Label Amendment—correction to add missing page 4 of 5 on product label housed on PPLS

Product Name: REPEL-X®

EPA Reg. No.: 270-294

Application Dated: April 23, 2010

Decision Number: 432812

Dear Ms. Purcell:

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

1. Revise the precautionary statements under 'Hazards to Humans and Domestic Animals' on page 2 by adding the following statement: "Do not apply to horses or foals intended for slaughter."
2. Revise the use directions for animal quarters (pages 2 and 3) after "Remove animals prior to treatment" by adding the following statements: "Allow treated surfaces to dry before allowing animals back into quarters treated with this product. Do not apply directly to any animals destined for milking or slaughter."
3. Revise the "Storage and Disposal" statement in accordance with the guidelines of Pesticide Registration Notice 2007-4, as follows:

"Storage and Disposal

Do not contaminate water, food, or feed by storage or disposal

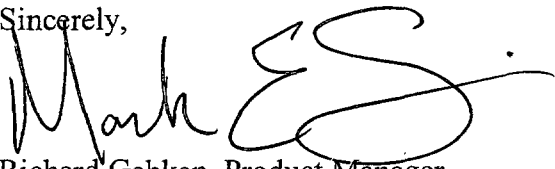
Pesticide Storage: Store in a cool, dry place. Do not store near heat or open flame. Store pesticides away from food, pet food, feed, seed, fertilizers, and veterinary supplies.

Container Handling: Nonrefillable container. Do not reuse or refill this container. If empty: Place in trash or offer for recycling, if available. If partly filled: Call your local solid waste agency or call 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain."

Farnam Companies, Inc. should note that notices of availability of EPA's reregistration eligibility decision (RED) document for products containing pyrethrins, piperonyl butoxide, and permethrin have been published in the *Federal Register*. As a result, additional data and/or labeling changes may be required for products containing pyrethrins, piperonyl butoxide, and/or permethrin.

You must submit two copies of the final printed label revised in accordance with the comments listed above before the product is released for shipment under this label. If you have any questions, you may contact Clayton Myers at (703) 347-8874 or myers.clayton@epa.gov. A copy of your label stamped "Accepted with Comments" is enclosed for your records.

Sincerely,


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

Enclosure
Stamped Label

ACCEPTED
With COMMENTS
In EPA Letter Dated:
JUL - 8 2010

Under the Federal Insecticide, Fungicide
and Rodenticide Act, As amended, for the
pesticide Registered under EPA Reg. No:

READY TO USE
REPEL-X®

270-294

Insecticide & Repellent

For Use on Horses, Dogs, and Their Premises,
Including Barns, Milking Parlors, and Other Animal Quarters
Kills and repels six fly species, ticks, gnats and mosquitoes
Water Based

ACTIVE INGREDIENTS

Pyrethrins	0.05%
*Piperonyl Butoxide, Technical	0.50%
**Permethrin	0.10%

OTHER INGREDIENTS 99.35%

TOTAL.....100.00%

* Equivalent to 0.4% (butylcarbityl) (6-propylpiperonyl) ether and 0.1% of related compounds.

** (3-phenoxyphenyl) methyl (+/-) cis/trans 3- (2,2 dichloroethenyl) 2, 2-dimethyl cyclopropane carboxylate.

cis/trans ration: min. 35% (+/-) cis and max 65% (+/-) trans

KEEP OUT OF REACH OF CHILDREN

CAUTION

See Back Panel For Additional Precautionary Statements.

NET CONTENTS _____ (_ FL. OZ.)

EPA Reg. No. 270-294

EPA Est. No. _____

FARNAM COMPANIES, INC.
Horse Products Division
P.O. Box 34820
Phoenix, AZ 85067-4820
(602) 285-1660
M-F 7:00 AM - 3:45 PM MST

**READ ENTIRE LABEL BEFORE EACH USE
USE ONLY ON DOGS OR HORSES**

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

Not for use on humans. Harmful if swallowed, inhaled, or absorbed through skin. Avoid breathing spray mist. Avoid contact with eyes, skin or clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

Hazards to Domestic Animals: For external use only. Do not use on animals under three months of age or on sick, old, debilitated or medicated pets. Do Not Use on Cats. Sensitivities may occur after using ANY pesticide product for pets. If signs of sensitivity occur, bathe your pet with mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately.

KILLS AND REPELS: Stable flies, horse flies, face flies, deer flies, house flies, horn flies, mosquitoes, gnats, ticks, fleas, chiggers, and lice.

DIRECTIONS FOR USE

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

FOR HORSES USE FULL STRENGTH. This non-oily insecticide repellent may be applied with a trigger spray applicator, or as a wipe. Kills and repels stable flies, horse flies, face flies, deer flies, house flies, horn flies, mosquitoes, gnats, ticks, fleas, chiggers, and lice. Do not use on foals under 3 months of age.

DIRECTIONS FOR WIPE-ON USE: Thoroughly brush horse to remove excess dirt and dust. Extremely dirty horses should be shampooed, rinsed, and allowed to dry before applying wipe. Use a sponge, clean soft cloth or mitt. Apply liberally over areas to be protected. Pay special attention to legs, belly, shoulders, neck, and facial areas. Avoid eyes and mucous membranes.

DIRECTIONS FOR TRIGGER SPRAY USE: Remove excess dirt and dust. Apply light spray mist to coat while brushing lightly against lay of the hair. Avoid spray in eyes and mucous membranes. Apply with sponge or cloth to those areas.

TO KILL AND REPEL FLYING INSECTS IN ANIMAL QUARTERS: Use this product in horse and cattle (beef and dairy) barns, milk houses, poultry houses, swine quarters,

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kennels, outbuildings, pens and shelters to kills and repel stable flies, horse flies, face flies, deer flies, house flies, horn flies, mosquitoes, gnats, ticks (including Deer Ticks), fleas, chiggers, and lice. Apply undiluted as either a surface spray or space spray (fog). Remove animals prior to treatment.

Surface Spraying. Use a good sprayer adjusted to deliver a coarse wet spray. Apply as a coarse wet spray using 1 pint per 1,000 square feet. Direct the spray wherever flies congregate or alight, until surfaces are moistened. Treat around doorways, feed storage rooms, alleyways and windowsills. Spray around outside of door facings and screens to render area unattractive to insects. This helps to repel insects and prevent entrance into building.

Space Spraying. Before application, close doors, windows and other openings and shut off ventilating systems to reduce air movement as much as possible. Apply with a good machine adjusted to deliver a fine mist or fog. Direct spray at an upward angle, distributing it uniformly throughout the entire area at a rate of 2 fluid ounces per 1,000 cubic feet (10 ft x 10 ft x 10 ft). Apply by directing spray toward ceiling and corners until the space is filled with mist. For best results, keep doors and windows closed, when possible, for 10 minutes during spraying and after application. Applicator must not remain in treated area. After the 10 minute treatment period, the area should be opened and ventilated prior to reoccupation by humans or animals.

Do not contaminate water, feed or foodstuffs, milk or milking utensils. Repeat treatment daily, or at intervals needed to give adequate protection.

FLEAS AND TICKS ON DOGS: Start spraying at the animal's head, avoiding the eyes and mouth as you spray. Make sure the animal's entire body is covered including the legs, underbody and tail. While spraying, fluff the hair so that the spray will penetrate to the skin. Make sure spray wets thoroughly. Avoid contact with genitalia. Reapply every day. Do not use on puppies under three months of age. Consult a veterinarian before using this product on debilitated, aged, medicated, pregnant, or nursing animals. **DO NOT USE ON CATS.** Sensitization may occur after using any pesticide product for pets. If signs of sensitivity occur, bath your dog with mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately.

PET AREAS: To control Fleas and Brown Dog Ticks on premise: Thoroughly spray infested areas, pet beds, resting quarters, nearby cracks and crevices, along and behind baseboards, moldings, window and door frames, and local areas of floor and floor covering. Fresh bedding should be placed in animal's quarters following treatment. Concurrent treatment of animals is recommended. Reapply everyday.

To kill and repel flying insects in animal quarters: Spray in areas where insects congregate. Direct spray to contact insects for rapid knockdown and kill. Spray around

outside of door facings and screens to render area unattractive to insects. This helps to repel insects and prevent entrance into building.

ENVIRONMENTAL HAZARDS

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

FIRST AID	
IF SWALLOWED	<ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice • Have a person sip a glass of water if able to swallow • Do not induce vomiting unless told to do so by a poison control center or doctor • Do not give anything by mouth to an unconscious person
IF INHALED	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. • Call a poison control center or doctor for further treatment advice.
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 the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
IF ON SKIN	<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.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	

PHYSICAL AND CHEMICAL HAZARDS

Do not use this product in or on electrical equipment due to the possibility of shock hazard.

STORAGE AND DISPOSAL

STORAGE: Store in a cool, dry place. Do not store near heat or open flame.

DISPOSAL: If empty: Do not reuse this container. Place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency or call 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.