26 JUN 1992

Whitmire Research Laboratories Inc. 3568 Tree Court Industrial Boulevard St. Louis, MO 63122

Attn: Michael G. Sarli

Subject: Whitmire PT-405 UltraGuard Flea Growth Regulator EPA Registration No. 499-365 Application dated June 5, 1992

Dear Mr. Sarli:

The proposed mendment to the registration of the product cited above under The Federal Insecticide, Fungicide, and Rodenticide Act expanding the label directions and changing the brand name to "Whitmire PT-412 UltraGuard " is acceptable subject to the comments listed below.

- 1) The statement " To control the source of infestation, pets should be treated with a product registered for on-animal flea control. " must be added to the label.
- 2) The statement " Old pet bedding should be replaced with fresh, clean bedding after treatment. " must be added to the label.
- 3) The statement " Do not use this product in or on electrical equipment due to the possibility of shock hazard. " must be added to the label.
- 4) Change the statement " It is a violation xxx labeling. " to read " It is a violation of Federal Law xxx labeling. "

The change in brand name to "Whitmire PT-412 UltraGuard " is acceptable. Future correspondence should refer to the product by this name.

A stamped copy of the draft label is enclosed for your records. Submit two copies of the final printed label before the product is released for shipment under this amended label.

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Sincerely,

Richard F. Mountfort Product Manager 10 Insecticide & Rodenticide Branch **Registration Division (H7505C)**

5/4/92

WHITMIRE PT[•] 412 UltraGuardTM Flea Growth Regulator

PT 412 UltraGuard will control flea larvae and prevent flea eggs from hatching.

For use in Apartments, automobiles, homes, hospitals. hotels, kennels, motels, offices, schools, supermarkets, transportation equipment (buses, boats, ships, trains, trucks, planes), warehouses, utilities, veterinary clinics and other commercial and industrial buildings.

EPA REG. NO. 499-365 EPA Est. No. 499-MO-1

KEEP OUT REACH OF CHILDREN CAUTION STATEMENT OF PRACTICAL TREATMENT

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

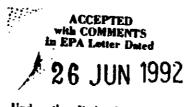
IF INHALED: Remove person to fresh air. Apply artificial respiration if indicated.

IF IN EYES: Flush eyes with plenty of water. Get medical attention immediately.

IF ON SKIN: Remove contaminated clothing and wash affected areas with soap and water.

See side panel for additional precautionary statements

NET WEIGHT 16 oz.



Under the Federal Insocticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 499-365

WHITMIRE PT[●] 412 UltraGuardTM

GENERAL INFORMATION

PT[•] 412 UltraGuardTM Contains a flea growth regulator which affects the immature stages of fleas. PT[•] 412 UltraGuardTM can be used as a preventative treatment to prevent flea eggs from halching and larvae from developing into adult fleas for a full season. If adult fleas are present in treated areas, a product which controls adult fleas should be used with PT[•] 412 UltraGuardTM. In transportation equipment, certain plastics may be whitened or dulled. Apply only to carpets and cloth upholstered areas, or test an inconspicuous area before treating.

PRECAUTIONARY STATEMENTS Hazards to Humans and Domestic Animals

CAUTION

Harmful if swallowed or inhaled. May be absorbed through the skin. Avoid breathing of spray mist and provide adequate ventilation of area being treated. Avoid contact with skin, eyes, or clothing. Wash thoroughly after using and before smoking or eatine. Do not allow children or pets to contact treated surfaces until spray has dried. Avoid contamination of food, utensils, and food preparation surfaces. Remove pets and birds and cover or remove aquariums before use.

ENVIRONMENTAL HAZARDS

This product is toxic fish and other aquatic invertebrates. Do not apply directly to water. Apply this product only as specified on the label. Do not contaminate water by cleaning of equipment or disposal of wastes.

PHYSICAL OR CHEMICAL HAZARDS

Extremely Flammable. Contents under pressure. Keep away from heat, sparks and open flame. Do not puncture or incinerate container. Do not use or store near heat or open flame. Exposure to temperatures above 130°F may cause bursting. Do not spray directly into any electronic equipment such as radios, televisions, computers, etc.

DIRECTIONS FOR USE

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

Use PT[•] 412 UltraGuardTM at the rate of one 16 oz. can per 1,200 - 1,500 sq. ft. Catpeted areas may be vacuumed before treatment and after treatment has dried. Treat areas which could be infested such as rugs, carpets, upholstered furniture, pet beds and pet resting areas. Hold can at arms length and direct spray toward the area to be treated. Use a sweeping motion to apply product and back away from treated area while holding the can 36 inches away from the surface being treated. Area of 80 - 100 sq. ft. can be treated in approximately 10 seconds with PT[•] 412 UltraGuardTM. When treating upholstered furniture, treat under cushions and areas where flea development occurs. Cover aquariums and fish bowls and remove birds from area prior to treating. Treated areas should be vacated during application. EXCEPT FOR APPLICATOR DO NOT PERMIT HUMANS OR PETS TO CONTACT TREATED SURFACES UNTIL THE SPRAY HAS DRIED. Do not treat pets with this product.

NOTICE: PT^{\bullet} 412 UltraGuardTM has been tested on several types of carpet, fabric and other household furnishings without adverte affects. In a few instances waxed surfaces have been whitened or dulled. Holding the can 36 inches away from the target surface normally prevents any whitening from occurring. Because of the wide variety of floor types and finishes, treat a small inconspicuous before treating the entire area. Avoid contact with antique finishes.

STORAGE & DISPOSAL

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

STORAGE: Store in a cool dry area away from heat or open flame and inaccessible to children. PESTICIDE DISPOSAL: Wastes resulting from use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Replace cap, wrap in newspaper and discard container in trash, sanitary landfill or by other approved state and local procedures. Do not incinerate or puncture.

LIMITATION OF LIABILITY

Manufacturer warrants that this product conforms to the chemical description on the label. Buyer assumes all risks of use in handling which are at variance in any way with the directions on the label. MANUFACTURER MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY OF FITNESS OR MERCHANTABILITY OR ANY OTHER EXPRESS OR IMPLIED WARRANTY. IN NO CASE SHALL MANUFACTURER BE LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT. DAMAGES CAUSED BY THIS PRODUCT ARE LIMITED TO REPLACEMENT OF THE PRODUCT OR RETURN OF THE PURCHASE PRICE.

A Prescription Treatment[•] brand insecticide from: Whitmire Research Laboratories, Inc. 3568 Tree Court Ind. Blvd. St. Louis, Missouri 63122 Copyright, 1992