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FEB 26 1997

Stacy A. Schmidt  
SureCo  
10012 N. Dale Mabry Hwy.  
Suite 221  
Tampa, FL 33618

Subject: R & M Flea & Tick Powder #5  
EPA Registration No. 769-613  
Amendment dated November 6, 1996  
Response to Agency letter dated 10/1/96

Dear Ms. Schmidt:

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:

1. Make the following changes to your label:

- a) In the Precautionary Statements section, delete the following sentences: "Wash thoroughly after handling. Do not treat puppies and kittens under 4 weeks of age. Keep out of reach of children." These instructions are repetitious since they also appear in the User Safety Requirements box on the same page. The instructions "do not treat puppies and kittens under 4 weeks of age" conflicts with the "12 weeks of age" instructions found later in your Directions for Use.
- b) Move the sentence "Dust bedding and doghouse using a shaker can or other dust applicator" from the Precautionary Statements section of your label to the DIRECTIONS FOR USE.
- c) Your product label does not contain an Environmental Hazards statement. Please add an Environmental Hazards statement as follows:

"ENVIRONMENTAL HAZARDS

This product is extremely toxic to aquatic and estuarine invertebrates. Do not apply directly to water.							
SYMBOL							
SURNAME							
DATE							

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d) Move the paragraph located directly beneath the User Safety Requirements box ("Use this product only outside.....puppies under 12 weeks of age.") to the DIRECTIONS FOR USE section as required in the Agency letter dated 10/1/96.

Ⓢ Delete the sentence "Apply at least once a week for best results" and replace it with "Do not repeat applications more than once a week."

2. Submit one copy of your final printed labeling before you release the product for shipment.

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.

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

Sincerely yours,

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Dennis H. Edwards, Jr.  
Product Manager (19)  
Insecticide-Rodenticide Branch  
Registration Division (7505C)

Enclosure

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# R & M FLEA & TICK POWDER #5

## KILLS FLEAS, LICE & TICKS ON DOGS & CATS

Formulated for the control of Fleas, Ticks (including Ticks which transmit Lyme Disease) and lice. Pleasantly scented to aid in the elimination of "animal odors".

### ACTIVE INGREDIENTS:

Pyrethrins .....	0.10%
*Piperonyl Butoxide, Technical .....	1.00%
Carbaryl (1-naphthyl N-methyl-carbamate) .....	5.00%
<b>INERT INGREDIENTS:</b> .....	<b>93.90%</b>
Total:	100.00%

\*Equivalent to 0.8% of (butylcarbityl)(6-propyl-piperonyl) ether and 0.2% related compounds.

EPA Reg. No. 769-613

EPA Est. No. 769-GA-1

**KEEP OUT OF REACH OF CHILDREN  
CAUTION  
See Back Panel for Precautionary Statements**

### STATEMENT OF PRACTICAL TREATMENT

**IF SWALLOWED:** Drink 1 or 2 glasses of water and induce vomiting by sticking finger down throat. Never give anything by mouth to an unconscious person. Call a physician.

**IF IN EYES:** Flush with plenty of water. If irritation persists see a physician.

**IF ON SKIN:** Wash with soap and water.

ACCEPTED  
with COMMENTS  
in EPA Letter Dated

FEB 26 1997

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

769-613

Manufactured by:  
SureCo, Inc.  
Fort Valley, GA 31030

Net Contents \_\_\_ oz.

495

**PRECAUTIONARY STATEMENTS  
HAZARDS TO HUMANS AND DOMESTIC ANIMALS.  
CAUTION**

Avoid breathing of dust when you apply powder. May be harmful if swallowed. Avoid contact with eyes, skin or clothing. Wash thoroughly after handling. Do not treat puppies and kittens under 4 weeks of age. Keep out of reach of children. Dust bedding and doghouse using a shaker can or other dust applicator.

**Notice to Physician:** Carbaryl is a moderate reversible cholinesterase inhibitor. Atropine sulfate is antidotal.

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**USER SAFETY REQUIREMENTS**

- Wear long-sleeved shirt, long pants, shoes plus socks and household latex or rubber gloves when applying this product.
- Change clothing as soon as possible after use.
- Wash the outside of gloves before removing. As with any pesticide product, wash hands thoroughly immediately after handling and before eating, smoking or using the toilet.

Use this product only outside or in a well-ventilated area. Wearing household latex or rubber gloves, dust entire animal, avoiding pet's eyes, nose, mouth and genital areas. Rub or brush pet's hair to work dust down to the skin. This product should not be applied by children. Do not use on pregnant dogs. Do not use on kittens or puppies under 12 weeks of age.

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**DIRECTIONS FOR USE**

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

**For Control of Fleas, ticks and lice:** Dust pet liberally by rubbing dust into animal's hair. Begin at tail and work toward the head. Take care not to get dust in animal's eyes, nose or mouth. Be sure to dust paws and between toes. Dust bedding, kennels and sleeping quarters regularly. Apply at least once a week for best results.

Do not repeat application more than once a week

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Do Not Use On Pregnant Dogs.

**STORAGE AND DISPOSAL**

**Storage:** Store in a cool dry place. Keep cap closed tightly.

**Disposal:** Do not reuse container. Wrap and put in trash.

This container is sold by weight, NOT by volume. You can be assured of the proper weight even though some settling of contents normally occurs during transportation and handling.

**IMPORTANT:** Read these entire Directions and Conditions of Sale before using this product.  
**DISCLAIMER:** SureCo warrants that this product conforms to the chemical description on the label and is reasonably fit for the specific purposes referred to in the Directions For Use, subject to the inherent risks referred to above. SureCo makes no other express or implied warranty, of fitness or merchantability nor any other express or implied warranty. In no case shall SureCo be liable for consequential, special, or indirect damages resulting from the use, handling or application of this product.

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