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Reg # 769-614  
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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FEB 24 1997

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

Subject: R & M Flea & Tick Powder #2  
EPA Registration No. 769-614  
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 use on kittens or nursing puppies. Do not use on kittens or puppies less than 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 use on kittens or puppies less than 4 weeks of age" conflicts with the "12 weeks of age" instructions found later in your Directions for Use.

b) Move the paragraph located directly beneath the User Safety Requirements box ("Use this product only outside.....using a shaker can or other dust applicator.") to the DIRECTIONS FOR USE section as required in the Agency letter dated 10/1/96.

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

CONCURRENCES

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295

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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,

151

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

Enclosure

395

**R & M FLEA & TICK POWDER #2  
FOR DOGS & CATS**

Pleasantly scented to aid in the elimination of "animal odors"

**KILLS FLEAS AND TICKS**  
(Including ticks which transmit Lyme disease)

**ACTIVE INGREDIENTS:**

Pyrethrins .....	0.10%
*Piperonyl Butoxide, Technical .....	1.00%
Carbaryl (1-naphthyl N-methylcarbamate) .....	12.50%

<b>INERT INGREDIENTS:</b> .....	<b>86.40%</b>
Total: .....	100.00%

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

EPA Reg. No. 769-614

EPA Est. No. 769-GA-1

**KEEP OUT OF REACH OF CHILDREN  
CAUTION**

**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 physician.

**If On Skin:** Wash with soap and water.

**If In Eyes:** Flush with plenty of water. If irritation persists, see Physician.

Manufactured By:  
SureCo, Inc  
Fort Valley, GA 31030

Net Contents: \_\_\_\_\_

ACCEPTED  
with COMMENTS  
in EPA Letter Dated

**FEB 24 1997**

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

769-614

495

**PRECAUTIONARY STATEMENTS**  
**Hazards to Humans and Domestic Animals**

**CAUTION**

May be harmful if swallowed. Avoid breathing dust. Avoid contact with eyes, skin or clothing. Wash thoroughly after handling. Do not use on kittens or nursing puppies. Do not use on kittens or puppies less than 4 weeks of age. Keep out of reach of children. Do not use this product in commercial food areas of food handling establishments, restaurants, or other places where food is prepared or processed.

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

**ENVIRONMENTAL HAZARDS**

This product is extremely toxic to aquatic invertebrates. Do not apply to water or areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water by cleaning of equipment or disposal of wastes.

**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. Dust bedding and doghouse using a shaker can or other dust applicator.

**DIRECTIONS FOR USE**

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

**To control Fleas, Ticks and Lice on Dogs and Cats:** Dust powder liberally over the entire body. Rub dust into hair and around the feet, pads and between the toes so that

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they are well treated. Take care not to get the powder in animal's eyes, nose or mouth. Dust bedding, kennel and sleeping area regularly. Repeat as needed, but not more often than once weekly. Do not use on pregnant dogs.

**STORAGE AND DISPOSAL**

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

**Disposal:** Do not reuse container. Wrap and discard 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.