Stacy Schmidt SureCo, Inc. P.O. Box 938 Fort Valley, GA 31030

Dear Ms. Schmidt:

Subject: Response to Dipropyl Isocinchomeronate DCI

SureCo Flea & Tick Shampoo #7
EPA Registration Number 769-615
Submission Dated August 3, 1994

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

- 1. Add the phrase "Not for human consumption" after the word horses on the front panel of the label. Ensure that this phrase pertains to both horses and foals.
- 2. Revise the "IF IN EYES" Statement of Practical Treatment to read as follows:

"Hold eyelids open and flush with a steady, gentle stream of water for 15 minutes. Get medical attention."

The Notice of Registration issued for this product required the submission of information on the chemical identities for some of the components in the formulation. A review of the files could not identify whether or not your company has responded to this requirement from the Notice of Registration. Please clarify.

A stamped copy of the label is enclosed for your records. Submit three copies of revised final printed labeling prior to releasing product for shipment.

If you have any questions or comments, please contact me at (703) 305-6788.

Sincerely,

RPK

Richard P. Keigwin, Jr. Product Manager 10 Insecticide-Rodenticide Branch Registration Division (7505C)

SURGO FLEA AND TICK SHAMPOO #7

Repellent Shampoo With Natural Soothing ALOE

FOR CATS - KITTENS - PUPPIES - DOGS - HORSES - FOALS

KILLS FLEAS-LICE-TICKS

REPELS GNATS-FLIES-MOSQUITOES FOR 2 TO 3 DAYS

ACTIVE INGREDIENTS:

Pyrethrins	0.15%
*Piperonyl Butoxide, Technical	1.00%
N-Octyl Bicycloheptene Dicarboximide	0.50%
Di-n-Propyl Isocinchomeronate	0.50%
INERT INGREDIENTS:	97.85%
	100.00%

*Equivalent to 0.80% of (butylcarbityl) (6-propyl-piperonyl) ether and 0.20% of related compounds.

Inert ingredients include a concentrated, lathering shampoo enriched with coconut extract, lanolin and Aloe. Removes loose dandruff, dirt and scales. Leaves the coat soft and shining.

REEP OUT OF REACH OF CHILDREN WARNING
See Back Panel for Precautionary Statements

Manufactured by:
SureCo Professional Products, Inc.
P.O. Box 921879, Norcross, GA 30092-1879

EPA EST #769-GA-1

EPA REG #769-615

Net Contents ___ oz.

ACCEPTED
with GOMMENTS
in EPA Later Dated

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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.

May be used full strength or diluted with 2 parts water.

Thoroughly soak animal with warm water taking 2-3 minutes to wet hair. Do not apply shampoo around eyes. Apply shampoo on head and ears, then lather; repeat procedure with neck, chest, middle and hind quarter, finishing legs last. Let animal stand 3-5 minutes (this is an important part of the grooming procedure), then rinse animal thoroughly. In extremely dirty, or scaly animals, the above procedure may be repeated. May be used every 7-10 days.

HORSES (Not for Human Consumption)

Controls stable flies, horse flies, deer flies, face flies, gnats & mosquitoes. Follow above procedure. Repeat treatment as necessary.

STORAGE AND DISPOSAL

Storage: Store in a cool area.

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

PRECAUTIONARY STATEMENT Hazards to Humans and Domestic Animals WARNING

Human: Causes eye irritation. Do not get in eyes or on clothing. Harmful if swallowed. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

Animals: Do not use on pets and foals less than six weeks old.

Environmental Hazards: This product is toxic to fish. Keep out of lakes, streams, ponds, tidal marshes and estuaries. Do not wash animal where runoff is likely to occur.

STATEMENT OF PRACTICAL TREATMENT

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

IF SWALLOWED: Drink promptly a large quantity of milk, egg whites, gelatin solution, or if these are not available, drink large quantities of water. Avoid alcohol.

IF ON SKIN: Wash with plenty of soap and water. Get medical attention if irritation persists.

Buyer assumes all risks of use, storage or handling of this product not in strict accordance with this label.