

PM 4 1998

2/13/93

1/5

FEB 13 1998

326
17
5-536688

CERTIFIED MAIL (P-065-164-319)

ROCCORP
1113 Industrial Parkway, North
P.O. Box 785
Brunswick, OH 44212

Attention: Mr. William E. Donze

Subject: HiLo Dip
EPA Reg. No. 1452-3
Your submission of January 20, 1998

In the above letter, you responded to our requests for information, which we have now reviewed, as follows:

1. Children Resistant Packaging (CRP) Certification

You indicated that this product had been in CRP for at least 11 years. You committed to submitting a formal certification or to rerunning the acute oral toxicity testing by June 19, 1998.

The standard certification under 40 CFR 157.34, reads as follows:

I certify that the packaging that will be used for this product meets the standards of 40 CFR 157.32.

2. Current Labeling

We have received a copy of your current labeling and have placed it in our files. September 1, 1998, is the last date that you can ship product with this label.

3 Existing Stocks

You indicated that you had about six months (or until July 20, 1998, of existing stocks. You also indicated that you could change to the labeling approved today as soon as the old stocks were exhausted.

4 Revised Labeling

The labeling submitted with the above letter is acceptable, provided that you submit one (1) copy of final printed labeling with the following changes before you release the product for shipment:

- a. Place an asterisk (*) after "Rotenone" and "Other Associated Resins" in the Ingredient Statement.
- b. Directly below "INERT INGREDIENTS", add:

*Derived from the roots of the cube plant.

This registration will be subject to cancellation in accordance with FIFRA sec. 6(e) if you do not comply with these conditions. 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,



Daniel B. Peacock, Biologist
Insecticide-Rodenticide Branch
Registration Division (7504C)

Enclosures: 1. Stamped Label
2. A-79 Enclosure

Peacock:Disk 15:A:\Rotenone\1452-305-5407:2/13/98

SPECIMEN LABEL

FRONT

HILO DIP
KILLS FLEAS, TICKS AND LICE
EACH OUNCE MAKES 2 GALLONS OF DIP SOLUTION
WITH ROTENONE, CLEAN FRESH PINE FRAGRANCE
RINSE AWAY FLEAS, TICKS AND LICE

ACTIVE INGREDIENTS:

Rotenone.....	1.0%
Other Associated Resins.....	1.0%
INERT INGREDIENTS.....	98.0%

ACCEPTED
with **COMMENTS**
in EPA Letter Dated: _____
100.0%

FEB 13 1998

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

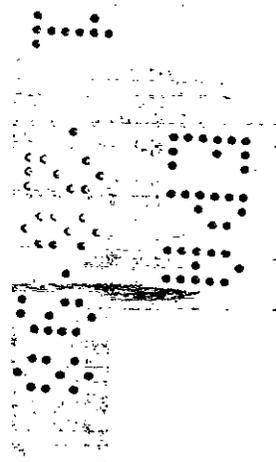
KEEP OUT OF REACH OF CHILDREN

1452-3

WARNING

See Back Panel for Precautionary Statements

NET CONTENTS: _____ oz.



DIRECTIONS FOR USE

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

PETS

PRE-TREATMENT DIRECTIONS

READ ENTIRE LABEL BEFORE EACH USE.

USE ONLY ON DOGS TO KILL FLEAS, LICE, AND TICKS: Do not use on animals under 12 weeks. Do not use undiluted. SHAKE WELL BEFORE USING.

SPECIAL ANIMALS

Consult a veterinarian or call 1-800-HILO-DIP before using this product on a debilitate, aged, pregnant, nursing, or medicated animals.

ADVERSE REACTION INFORMATION

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, or call 1-800-HILO-DIP.

APPLICATION DIRECTIONS

For short-haired dogs:

To kill fleas and lice, mix 1/2 fluid ounce of Dip per gallon of water. To kill ticks mix two fluid ounces of Dip per gallon. Saturate dog's coat thoroughly for several minutes and dry without rinsing. Avoid eyes, mouth, and nose.

For long-haired dogs:

To kill fleas and ticks, follow directions for short-haired dogs. To kill lice, first bathe dog with soap and water. Avoid eyes, mouth, and nose. Rinse out soap. Then follow directions for short-haired dogs as a final rinse.

REAPPLICATION DIRECTIONS

Reapply once a day as necessary.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

WARNING

Causes substantial but temporary eye injury. Harmful if swallowed or absorbed through the skin. Avoid contact with skin, eyes or clothing. Wear protective eyewear (goggles or safety glasses) and waterproof gloves when handling undiluted product. Wash thoroughly with soap and water after handling and before eating, drinking, or using tobacco. Remove contaminated clothing and wash before reuse.

FIRST AID

IF SWALLOWED: Call a physician or poison control center. Drink promptly a large quantity of milk, egg whites, gelatin solution, or if these are not available, drink large quantities of water. Avoid alcohol. Induce vomiting by touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person.

IF IN EYES: Flush with plenty of water. Call a physician.

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

ENVIRONMENTAL HAZARDS

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

STORAGE AND DISPOSAL

Storage: Store only in original container, in a dry place inaccessible to children and pets.

Disposal: Do not reuse empty container. Rinse thoroughly. Securely wrap in newspaper and discard in trash.

MANUFACTURED BY :

ROCCORP, INC.

PO BOX 785

BRUNSWICK, OH 44212

EPA EST NO 1452-OH-1

EPA REG NO 1452-03