

JUL 8 1991

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Mr. William E. Donze
ROC CORP, INC.
P.O. Box 785
1113 Industrial Parkway, North
Brunswick, OH 44212

Dear Mr. Donze:

Subject: Label amendment-Statement of Practical Treatment
HILO Silent Force Flea Spray for Dogs and Cats
EPA Registration Number 1452-24
Submission dated June 14, 1991

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. Five copies of the finished labeling must be submitted prior to releasing the product for shipment.

1. The label statement appearing on the front panel of the label declaring "A Botanical Insecticide" is misleading and therefore is not appropriate under the provisions of 40 CFR part 156.10 (a)(5)(vii). Delete this phrase.
2. Delete the statement "Do not induce vomiting because of aspiration hazard" from the STATEMENT OF PRACTICAL TREATMENT. This statement is not appropriate.

Sincerely,

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

PROPOSED LABEL

FRONT PANEL

HILO
SILENT FORCE FLEA SPRAY
For Dogs and Cats

New Continuous Non-Aerosol Spray Dispenser
Kills Fleas & Ticks with Pyrethrins,
A Botanical Insecticide

BEST AVAILABLE COPY

ACTIVE INGREDIENTS:

Pyrethrins..... 0.06%
*Piperonyl Butoxide, Technical..... 0.60%

INERT INGREDIENTS;.....99.34%
100.00%

*Equivalent to 0.48% (butylcarbityl)(6-propylpiperonyl) ether
and 0.12 related compounds.

KEEP OUT OF REACH OF CHILDREN

C A U T I O N

See Back Panel for Additional Cautions

Net Contents _____ oz.

**ACCEPTED
with COMMENTS
In EPA Letter Dated
JUL 8 1991**

*Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
1452-34*

BACK PANEL

A Nonflammable Water Based Mirco Emulsion System

DIRECTIONS FOR USE

IT IS A VIOLATION OF FEDERAL LAW TO USE THIS PRODUCT
IN A MANNER INCONSISTENT WITH ITS LABELING

DOGS & CATS: Cover or remove fish aquariums before spraying pets. Cover animal's eyes with hands. Spray head, ears, and chest until damp...With fingertips, rub into face around mouth, nose and eyes. Then spray neck, middle and hind quarters, finishing legs last. For best penetration of spray to the skin, direct spray AGAINST natural lay of the hair, spraying the ruffled hair directly behind the hand. Make sure spray thoroughly wets ticks. Repeat treatment as needed.

PUPPIES & KITTENS: Treat same as dogs and cats, except nursing puppies and kittens. Spray only along back or on your fingertips and rub in with your fingertips.

STORAGE & DISPOSAL: Store in a cool dry area. Protect from freezing. Do not reuse empty container. Wrap container and put in trash collection.

PRECAUTIONARY STATEMENT

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

C A U T I O N

HUMAN: Harmful if swallowed or inhaled. Avoid breathing mist. Avoid contamination of food. Wash hands with soap and water after using.

ANIMAL: Avoid treatment of nursing puppies and kittens. If treatment is necessary, spray on tips of fingers and rub into coat.

ENVIRONMENTAL HAZARDS: This product is toxic to fish and other aquatic animals. Do not apply directly to lakes, streams or ponds. Do not contaminate water when disposing of equipment washwater.

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Contact physician immediately. Do not induce vomiting because of aspiration hazard.

*not necessary -
no feet -
just in
product*

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

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

IF IN EYES: Flush eyes with plenty of water. Call a physician if irritation persists.

Manufactured by:

ROCCORP, INC.
P.O. BOX 785
BRUNSWICK, OHIO 44212

EPA REG. NO. 1452-24

EPA EST. NO. 1452-OH-1

