

1543-13

5/21/2002

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

MAY 21 2002

Ms. Louise A. Chartier
W.F. Young, Inc.
302 Benton Drive
E. Longmeadow, MA 01028

Subject: Amendment Updating Disposal Instructions per PR Notice 2001-6
Absorbine Ultra Shield® Brand Residual Insecticide & Repellent Towelettes
EPA Reg. No. 1543-13
Your Submission Dated April 12, 2002

Dear Ms. Chartier:

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 below. Two (2) copies of the finished labeling must be submitted prior to releasing the product for shipment. A stamped copy of the label is enclosed for your records.

1. The revised Disposal instructions do not conform to the guidance provided in PR Notice 2001-6. However, we agree that the guidance in the PR Notice is not entirely applicable to products, such as this one, which consist of individually wrapped towelettes in an outer cardboard box. We have no objection to the modified disposal instructions which you have proposed provided you make the following change:

In the last sentence of the Pesticide Disposal instructions, change "pour" to "place", so that the revised sentence reads: "Never place unused product down the drain or on the ground."

2. The ingredient statement on the outer box must be re-formatted to comply with the regulations at 40 CFR §156.10(g)(1). As specified in the regulations, the terms "active ingredients" and "inert ingredients" must be aligned to the same margin. The 2-column format is not acceptable. We recognize that the label has been approved with this format since 1993; however, our prior approval was in error.

If the size or form of the package makes it impractical to place the ingredient statement on the front panel in the correct format, you may request permission for the ingredient statement to appear elsewhere (side or back panel, for instance) in accordance with 40 CFR §156.10(g)(2). If you wish to do so, your request should include a detailed explanation regarding the impracticality of placing the ingredient statement on the front panel.

If you have any questions regarding this action, please contact Susan Stanton of my team at (703) 305-5218.

Sincerely,



George T. LaRocca
Product Manager (13)
Insecticide Branch
Registration Division (7505C)

Enclosure

PRINTED SIDE

SAMPLE #1291057

12/17/91

W.F. YOUNG

ULTRA SHIELD
5 x 1 x 4 1/32

RTP

.016 SBS

with
In EP

M
Under a
Fungicide
as amen
registers

• Kills Fleas, Ticks and Lice
on Dogs for up to 28 days
• Repels Flies, Mosquitoes
and Gnats for 3-5 days

ULTRA SHIELD
ABSORBINE
Insect Repellent Towelettes

READ ENTIRE LABEL BEFORE EACH USE USE ONLY ON HORSES, PONIES AND DOGS
DIRECTIONS FOR USE: It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. This water-based formulation may be applied directly as a wipe-on.

HORSES AND PONIES: Repels and controls house flies, stable flies, horn flies, face flies, horse flies, deer flies, mosquitoes and gnats. Kills fleas and ticks. Repels flies, mosquitoes and gnats for 3-5 days.

INSTRUCTIONS: First, brush animal to remove excess dirt and sweat. Rub towelette against hair growth. Apply around eyes, ears, nose and under belly. Only a light application is required. Do not wet skin. After application, brush thoroughly to bring out a bright sheen on the coat. Reapply as needed.

DOGS: Kills fleas, ticks and lice on dogs and provides up to 28 days protection from reinfestation.

INSTRUCTIONS: First, brush animal to remove excess dirt and sweat. Rub towelette against the natural lay of the hair. Carefully apply to face around mouth, nose and eyes. Then apply to neck, middle and hindquarters, finishing legs last. Only a light application is required. Do not wet skin. After application, brush thoroughly to bring out a bright sheen on the coat. During the flea season retreat every 3-4 weeks if necessary. Do not use on foals or puppies under 12 weeks.

STORAGE AND DISPOSAL STATEMENTS: Feasible Storage: Store in a cool area above 32°F and protect from freezing. Pesticide Disposal: Call your local solid waste agency or (1-800-CLEANUP or equivalent organization) for disposal instructions. Unless otherwise instructed place in trash. Never pour unused product down the drain or on the ground. Container Disposal: Do not re-use container. Place in trash.

PRECAUTIONARY STATEMENTS
Hazardous to Humans and Domestic Animals:
Harmful if absorbed through the skin. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling. Sensitivities may occur after using ANY pesticide product on pets. If signs of sensitivity occur bath your pet with mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately.
Consult a veterinarian before using this product on debilitated, aged, pregnant or nursing animals or animals on medication.

ENVIRONMENTAL HAZARDS
This product is toxic to fish. Keep out of lakes, streams or ponds. Do not apply where runoff is likely to occur. Do not contaminate water when disposing of equipment washwaters. Apply this product only as specified on this label.

FIRST AID

If swallowed:	• Call poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
If inhaled:	• Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. • Call a poison control center or doctor for further treatment advice.
If on skin or clothing:	• Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
If in eyes:	• Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for further treatment advice.

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CWTY 8:00 A.M. - 4:30 P.M. E.S.T.

FOR DOGS PONIES
AND HORSES



ULTRA SHIELD

Residual Insecticide & Repellent Towelettes

PLEASANTLY SCENTED WITH ALOE, LANOLIN, CITRONELLA AND SUNSCREEN SILICONE / WATER BASE

ACTIVE INGREDIENTS:
PERMETHRIN 0.40% PIPERONYL BUTOXIDE 0.08%
PYRETHRINS 0.08% INERT INGREDIENTS
*(3-PHENOXYPHENYL) METHYL (±) CIS-TRANS 3-(2, 2-DICHLOROETHYL) DIMETHYLCYCLOPROPANECARBOXYLATE CIS-TRANS RATIO: MIN. 35% (±) CIS-TRANS RATIO: MIN. 35% (±) BUTYL CARBITYL (6-PROPYLPIPERONYL) ETHER AND .16% EQUIVALENT TO .63% (BUTYL CARBITYL) (6-PROPYLPIPERONYL) ETHER AND .16%

KEEP OUT OF REACH OF CHILDREN
CAUTION
SEE BACK PANEL FOR ADDITIONAL CAUTIONARY STATEMENTS

CONTAINS TEN, NET WT. 0.28 oz. (8g) TOWELETTES

ULTRA SHIELD
ABSORBINE
Insect Repellent Towelettes

315895-Temp

ULTRA SHIELD
Insect Repellent Towelettes

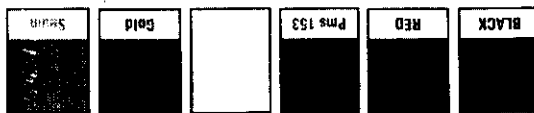
• Kills Fleas
on Dogs
• Repels
Mosquitoes
and Gnats



USE RED AND STYLE PREVIOUSLY ESTABLISHED FOR
NEW ABSORBINE DESIGN TO CREATE BANNER GRADATIONS

315895-Temp

Flexo Job#: 1997-051
 Date: 03/22/02
 Operator: ig
 Attention: Moe/Lenny
 Revision#: 1
 PO#: 000000



19970510 Red 153 Black Gold Silver

NET WT. 0.28 OZ. (8.8 g)

SEE BACK PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS
 CAUTION
 KEEP OUT OF REACH OF CHILDREN
 (6-PROTECTOR/PROVIDER EYE/EAR AND 100% RELATIVELY COMPACT)

PERMETHRIN
 PYRETHRINS
 INERT INGREDIENTS
 100%
 40%
 50%
 10%
 ALSO CONTAINS A GROOMING AID AND COAT CONDITIONER.
 KILLS FLEAS, TICKS AND LICE ON HORSES FOR UP TO 28 DAYS.
 PLEASANTLY SCENTED WITH ALOE, LAVENDER,
 CITRONELLA AND SASSAFRASE IN A NON-OIL
 SILICONE/WATER BASE.

ULTRASHIELD[®]



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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. This water-based formulation is to be applied directly as a wipe on. **USE ONLY ON HORSES, PONIES AND DOGS.**
INSTRUCTIONS: FOLLOW DIRECTIONS FOR USE ON OUTER CARTON, RETAIN THE OUTER CARTON FOR FUTURE USE.

STORAGE AND DISPOSAL STATEMENTS

PESTICIDE STORAGE: Store in a cool area above 32°F and protect from freezing.
PESTICIDE DISPOSAL: Call your local solid waste agency or (1-800-CLEANUP or equivalent organization) for disposal instructions. Unless otherwise instructed place in trash. Never pour unused product down the drain or on the ground.
CONTAINER DISPOSAL: Do not reuse container. Place in trash.

PRECAUTIONARY STATEMENTS CAUTION

Hazards to Humans and Domestic Animals: Harmful if absorbed through the skin. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling. Sensitivities may occur after using ANY pesticide product on 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. Do not use on foals or puppies under 12 weeks. Consult a veterinarian before using this product on debilitated, aged, pregnant or nursing animals or animals on medication.
ENVIRONMENTAL HAZARD: This product is toxic to fish. Keep out of lakes, streams or ponds. Do not apply where runoff is likely to occur. Do not contaminate water when disposing of equipment washwaters. Apply this product only as specified on this label.

FIRST AID

If swallowed: • Call poison control center or doctor immediately for treatment advice.
 • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
If inhaled: • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth if possible.
 • Call a poison control center or doctor for further treatment advice.
If on skin or clothing: • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
If in eyes: • Hold eye open and rinse slowly and gently with water for 15-20 minutes.
 • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.
 • Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.
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1/4