MAY 1 0 1998

Beecham Laboratories 501 Fifth Street Bristol, Tennessee 37620

Dear Dr. Alan R. Wagner

Subject: Mycodex Aqua-Spray EPA Reg. No. 2097-15

Application dated March 22, 1990

The proposed amendment to the registration of the product cited above under the Federal Insecticide Fungicide and Rodenticide Act removing the active ingredient, NGK R-11, is acceptable subject to the comments listed below. A stamped copy of the label is enclosed for your records.

- 1) Based on the current Confidential Statement of Formula (CSF) dated March 22, 1990 the product will not meet the label claim for the active ingredients. The percentage claimed in the ingredient statement for the active ingredients must be the same as the certified lower limit for the these ingredients listed in the CSF. A new CSF which agrees with the label declaration must be submitted or the label ingredients statement must be changed to agree with the current CSP.
- 2) This change in formulation is only acceptable as a basic formulation change not as an alternate formula. Submit a new CSP with the proper block checked.
- 3) Provide the upper and lower Certified Limits of the individually added inerts in the CSF.
- 4) Submit the product chemistry data for the new formulation including the flashpoint of the product.

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CONCURRENCES									
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- 5) Submit a 1 year storage stability study. The formulated product must be analyzed for its active ingredients at time zero and for one year of storage. The storage must be under warehouse conditions of temperature and humidity using containers similar to those which will be used in the trade. This study must be submitted within 15 months of the date of this letter.
- 6) Provide the chemical identity of the ingredient, Polyquaternium -6. Include the Chemical Abstracts Number and a Material Safety Data Sheet.
- 7) Since your data matrix does not give a dielectrical breakdown voltage, you must add the following to the use directions: "Do not use this product in or on electrical equipment due to the possibility of shock hazard."
- 8) The petroleum distillate may be declared as an inert ingredient.

Sincerely yours,

Phil Hutton

Product Manager (17)

Insecticide-Rodenticide Branch Registration Division (H7505C)

PRECAUTIONARY STATEMENTS

MAZARDS TO NUMANS AND DOMESTIC ANIMALS

CAUTION

(COLLECT: Hornful if purificual or inheled. Avaid breathing mipt. Avaid contamination of fund. Wesh hands with map and water after using.

ANDMAL: Avoid treatment of morning bitture and proper.
If treatment in uncersary spring on tipe of linguit and

FROMORMENTAL NAZAROS: This product is tonic to fine. GO NOT APPLY DIRECTLY TO WATER.

STORAGE AND DISPOSAL

Starage: Stare in a cool, dry area.

Disposal: Do not rouse empty container. Wrop container and put in trush cullection. EPA EST, NO. 37425-91-1 EPA REG. MJ. 2007-15

85 6370-01

Control No.

3051-31 **MYCODEX®** aqua-spray

WITH PYRETHRINS

KILLS. GROOMS OF COORIES

KILLS FLEAS AND TICKS ON DOGS AND CATS

ACTIVE INGREDIENTS	
Pyrethrins	.0.20%
Piperanyi butazide technical	
Petroleum distillate	.0.96%

MERT INGREDIENTS 96.BAX
TOTAL 100.00%
SOLD EXCLUSIVELY THROUGH VETERMARIANS

CAUTION

KEEP OUT OF BEACH OF CHILDREN SEE SIDE PAREL FOR ADORTIONAL PRECAUTIONARY STATEMENTS

Het Contents 16 R. oz. (473 mL)

Beecham

Incompanies

ON, OF DEEC-AM INC. BASTOL, TENS. 37620

OUNECTIONS FOR USE

CATS and BOGS It is a violation of Federal her to use this product in a manner inconstructed with its labeling. Cover animal's open with hand and with a firm fast strate,

Cover existat's eyes with hand and with a firm fast storks, to get a proper spray mist, avery band, dues and chest and id dues. With finger tips: 1 into face and created mouth, note, and eyes. Then apray each, middle and bind questers, facilities logs; lost. For bord posteration of apray to the chin, direct apray against the natural lay of the hair. On long baired dogs, only your hand against the lay of the hair, praying the extilled hair directly belied the hand. Make oure spray throughly writs ticks. Repost treatment as according for improved apparance, sign off access with toward and conto or brush parance, sign off access with toward and conto or brush parance.

PUPPES and KITTERS
Treat same as case and dags except nothing pupples and
Litter, agray only along back or on your larger tips and
rule in with your larger size.

PETS' SLEEPING QUARTERS

PETS' SLEEPING QUARTERS
Spray around base heards, windows, door frames, wall
cracks and local area of flears. It measurings, gusts, or
fies are present, spray lightly into the air, flapest as needoil. The pets' hedding should be aprayed, making mer the
area hearach the hedding in aprayed, too. After spray hes
dried, respect of bedding and replace with heat hedding. Treat pets with one of our registered flea and lich
control products before allowing them to once treated
area.

ACCEPTED with COMMENTS in EPA Letter Dated:

1137 (**0** 1990

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