

JUN 27 2002

Mr. Craig Martens
PBI/Gordon Corporation
1217 West 12th Street
P.O. Box 014090
Kansas City, Missouri 64101-0090

Dear Mr. Martens:

Subject: Submission of new acute toxicity studies/change in
Product Composition
Gordon's Horse and Pony Spray
EPA Registration Number 2217-479
. Your fax dated May 29, 2002

The amendment referred to above, submitted in connection with registration under FIFRA section 3(c)(7)(a), is acceptable provided that you:

1. Submit and/or cite all data or other material required for registration/reregistration of your product under FIFRA section 3(c)(5) or FIFRA section 4 when the Agency requires all registrants of similar products to submit such data.
2. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling:
 - a. Under Environmental Hazards delete "xxx or wetlands (swamps, bogs, marshes and potholes)." The statement "Do not apply directly to water is sufficient."
 - b. Under Use Precautions add, "Do not apply to horses intended for slaughter or human consumption."
3. We note you agree to conduct a Viscosity (830.7100) and Miscibility (830.6319) study if our review your waiver request indicates that these studies are required.
4. Submit three (3) copies of your final printed labeling before you release the product for shipment.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

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GORDON'S HORSE & PONY SPRAY

USE AS A MIST OR WIPE-ON INSECTICIDE OR WHOLE BODY SPRAY.

KILLS AND REPELS HORN FLIES, STABLE FLIES, DEER FLIES, FACE FLIES, HORSE FLIES, HOUSE FLIES, MOSQUITOES, & GNATS.

ACTIVE INGREDIENTS:

Butoxypolypropylene glycolCAS Registry No. 9003-13-8.....	10.00%
Permethrin	0.50%
Piperonyl butoxide technicalCAS Registry No. 51-03-6.....	0.50%
Pyrethrins	0.05%
INERT INGREDIENTS:	88.95%
TOTAL	100.00%

Equivalent: 0.4% (butylcarbityl)(6-propylpiperonyl) ether and 0.1% related compounds.
This product contains petroleum distillates.

KEEP OUT OF REACH OF CHILDREN

CAUTION

See side panels for First Aid
and additional Precautionary Statements.

NET CONTENTS: 32 FLUID OUNCES (ONE U.S. QUART), ONE GALLON

968/ APXXXXXX
EPA REG. NO. 2217-479 Amend
EPA Est. No. 2217-KS-X
MANUFACTURED BY:



Telephone: 1-800-821-7925

ACCEPTED
with COMMENTS
in EPA Letter Dated

JUN 27 2002

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended,
registered in

1 of 5

2217-479

EPA Reg. No. 2217-479 Amendment



READ THE ENTIRE LABEL FIRST. OBSERVE ALL PRECAUTIONS AND FOLLOW DIRECTIONS CAREFULLY.

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

CAUTION: Harmful if absorbed through skin. Harmful if swallowed. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Wear long-sleeved shirt and long pants, socks, shoes, and gloves. Remove and wash contaminated clothing before reuse.

Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

First Aid Statements	
If swallowed:	<ul style="list-style-type: none"> • Immediately call a poison control center or doctor. • Do not induce vomiting unless told to do so by a poison control center or doctor. • Do not give any liquid to the person. • Do not give anything by mouth to an unconscious person.
If on skin or clothing:	<ul style="list-style-type: none"> • 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.
Note to Physician:	<ul style="list-style-type: none"> • May pose an aspiration pneumonia hazard. Contains petroleum distillate.
Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-877-800-5556 for emergency medical treatment information.	

ENVIRONMENTAL HAZARDS:

This pesticide is toxic to fish and aquatic invertebrates. Drift and runoff may be hazardous to aquatic organisms in neighboring areas. Do not apply directly to water or wetlands (swamps, bogs, marshes, and potholes). Do not contaminate water when disposing of equipment washwater.

DIRECTIONS FOR USE

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

STORAGE & DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

STORAGE: Store in original container in a locked storage area inaccessible to children or pets. To prevent cross-contamination during storage, keep separate from other pesticides, fertilizers, seeds, food, and feed.

PESTICIDE DISPOSAL: Securely wrap original container in several layers of newspaper and discard in trash.

CONTAINER DISPOSAL: Do not reuse container. Rinse thoroughly before discarding in trash.

HOW TO APPLY AND USE PRECAUTIONS:

Gordon's Horse and Pony Spray protects against biting flies and will impart a bright sheen to your animal's coat.

Gordon's Horse and Pony Spray will provide short-term protection (3 to 14 days) depending upon the fly species.

Gordon's Horse and Pony Spray may be applied as a fine mist with a sprayer or wiped on with a soft cloth. Read the entire label before application and refer to the chart for spray intervals and instructions.

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TO PREVENT INJURY APPLY THIS PRODUCT ONLY AS SPECIFIED ON THIS LABEL. DO NOT WET THE ANIMAL'S SKIN.

The objective is to create a barrier on the hair that will both repel and kill biting flies. The product is intended as a preventative measure and is not intended to help an animal recover from existing sores, skin lesions or bites due to pests.

Avoid any direct contact between the product and the animal's skin, particularly when skin pores are open, such as after exercise or when the animal is perspiring heavily. Use extra care with young, old or sick animals. Also, use extra care with thin haired or light skinned animals such as Arabians and Palominos.

If the animal has open sores, skin lesions, cuts, wounds, or irritated skin from pest infestations contact your veterinarian before using this product. Avoid any direct contact between the product and the animal's skin.

Do not contaminate feed or feeding utensils. Cover or remove feed before spraying. Do not use on meat or dairy animals.

APPLICATION METHOD:

Mist:

- Ready-To-Use: Use undiluted as a localized or spot treatment applied with mist/trigger sprayers.
- Apply this product to a clean coat. Brush animal to remove loose dust and dirt.
- Apply 3.25-6.5 fl.oz. of product per application per animal. Apply directly to face, neck, shoulders, flanks, back, legs and areas described in Table 1. Select the lower volume of product for low infestations and lower animal (horse) body weights.
- For initial treatments, apply daily for two (2) or three (3) days. As infestations decline, repeat the application at 14-21 day intervals if needed, if infestation persists, or if prescribed by veterinarian. The duration of activity may vary because of environmental conditions (e.g. rainfall) and management factors (husbandry, bathing or shampooing).
- Set the sprayer to the "Fine Mist" position; do not use coarse sprays. Do not make application in direct, hot sunlight.
- Do not wet the animal's skin.
- Do not apply to areas where animal has no hair. Avoid direct contact with the animal's skin.
- After application, brush the coat for uniform coverage. Securely cover feedstuffs, troughs, bins, or other food and water receptacles while spraying.

Wipe-On:

- Ready-To-Use: Use undiluted as a localized or spot treatment as a wipe-on with an applicator mitt, sponge or clean towel.
- Ready-To-Use: Use undiluted as a localized or spot treatment as a wipe-on with a towelette or other impregnated material.
- Apply this product to a clean coat. Brush animal to remove loose dust and dirt.
- Apply 3.25—6.5 fl.oz. of product per application per animal. Apply directly to face, neck, shoulders, flanks, back, legs, and areas described in Table 1. Select the lower volume of product for low infestations and lower animal (horse) body weights.
- For initial treatments, apply daily for two (2) or three (3) days. As infestations decline, repeat the application at 14-21 day intervals if needed, if infestation persists, or if prescribed by veterinarian. The duration of activity may vary because of environmental conditions (e.g. rainfall) and management factors (husbandry, bathing or shampooing).
- Do not wet the animal's skin.
- Do not apply to areas where animal has no hair. Avoid direct contact with the animal's skin.
- Securely cover feedstuffs, troughs, bins, or other food and water receptacles while spraying.

Whole Body Spray:

Concentrate diluted with water as a whole body treatment for mosquitoes, ticks, and horse sucking louse (lice).

- Measure the proper amount of product, pour the product into the sprayer, and add the appropriate amount of water.
- Use a 1:4 ratio with water by mixing 1.0 gallon of product with 4 gallons of water (one gallon of product provides five gallons of spray solution). Apply 1.0—2.0 pints of spray emulsion per animal.
- Treat animal thoroughly or cover the entire surface area of the animal (See Table 1). Avoid contact with eyes and muzzle (mouth and nostrils).
- Repeat the application at 14-21 day intervals if needed, if infestation persists, or if prescribed by veterinarian.

Table 1. Application Instructions of Gordon's Horse and Pony Spray for direct applications to horses and ponies.

Treatment Method	Pest Controlled	Application rate, fl.oz of product/adult animal	Retreatment interval, days	Instructions
Ready-To-Use Use undiluted as a localized or spot treatment.	Horse flies or deer flies	3.25—6.5 fl.oz. per application	14—21 days	Apply to head, neck, shoulders, flanks, legs, belly and croup (rump).
	Stable fly	3.25—6.5 fl.oz. per application	14—21 days	Stable flies bite chiefly about the legs. Apply to legs, ankles and belly
	Horn fly	3.25—6.5 fl.oz. per application	14—21 days	Horn flies hover over the backs, withers, and belly. Apply to withers, flanks and belly.
	Gnats	3.25—6.5 fl.oz. per application	14—21 days	Gnats hover about the eyes, ears, and nostrils. Treat face, ears, poll, jaw, and neck. Avoid contact with eyes and muzzle (mouth and nostrils).
	Face fly	3.25—6.5 fl.oz. per application	14—21 days	Face flies cluster on the head. Treat face, ears, poll, jaws and neck. Avoid contact with eyes and muzzle.
Concentrate Diluted with water as whole body spray.	Mosquitoes	Use 1:4 dilution	14—21 days	Treat entire animal or apply for complete coverage.
	Horse sucking louse (lice)	Use 1:4 dilution	14—21 days	Lice are most common about the head, neck, and base of the tail. Even if few lice are found, treat entire body.
	Ticks	Use 1:4 dilution	14—21 days	Treat the animal thoroughly with 1—2 pints of spray applied per animal.

LIMITED WARRANTY AND DISCLAIMER.

The manufacturer warrants only that the chemical composition of this product conforms to the ingredient statement given on the label, and that the product is reasonably suited for the labeled use when applied according to the Directions for Use.

THE MANUFACTURER NEITHER MAKES NOR INTENDS ANY OTHER EXPRESS OR IMPLIED WARRANTIES, INCLUDING ANY WARRANTY OF MERCHANTABILITY OR FITNESS OF A PARTICULAR PURPOSE, WHICH ARE EXPRESSLY DISCLAIMED. This limited warranty does not extend to the use of the product inconsistent with label instructions, warnings or cautions. Any damages arising from a breach of the manufacturer's warranty shall be limited to direct damages, and shall not include indirect or consequential damages such as loss of profits or values, except as otherwise provided by law.

The terms of this Limited Warranty and Disclaimer cannot be varied by any written or verbal statements or agreements. No employee or agent of the seller is authorized to vary or exceed the terms of this Limited Warranty and Disclaimer in any manner.