

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Dr. Thomas A. Miller  
 Virbac, Inc.  
 3200 Meacham Blvd.  
 Fort Worth, Texas 76137

Dear Dr. Miller:

Subject: Amendment- change in precautionary statements/Response to  
 our last letter  
 Permethrin Spray for Dogs  
 EPA Registration Number 2382-127  
 Your submission dated January 8, 1996

The application referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable, and a copy of a stamped label is enclosed for your records.

We have evaluated the similarity in formulations between the subject product and EPA Registration Number 2382-124 (Preventic L.A. IGR) and conclude they are substantially similar for acute toxicity purposes. Thus we will permit you to cite the dermal limit test for EPA Registration Number 2382-124 (Tox Category IV) in support of the subject product eliminating the need for precautionary labeling for this route of exposure.

The phrase "and out of the reach of children" in the storage and disposal statements is not required. Thus you may delete this addendum.

Sincerely yours,

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

	Enclosure			CONCURRENCES				
SYMBOL								
SURNAME								
DATE								

ACCEPTED  
with COMMENTS  
in EPA Letter Dated

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

2382-127

## PERMETHRIN Flea and Tick Spray for Dogs

Kills fleas and ticks for up to 15  
days including Ixodidae  
responsible for the transmission of  
the Lyme Disease

### ACTIVE INGREDIENT:

Permethrin: [(3-Phenoxyphenyl)  
methyl (+/-) cis-trans-3-(2,2-  
dichloroethenyl) 2,2-dimethyl  
cyclopropanecarboxylate]\*..... 1.0%  
INERT INGREDIENTS..... 99.0%  
TOTAL..... 100.0%

\*cis-trans isomer ratio: Min. 35% (+/-) cis  
Max. 65% (+/-) trans

### CAUTION

#### KEEP OUT OF REACH OF CHILDREN

See back panel for additional  
precautionary statements and  
directions

Net Contents: 8 fl. oz. (237 mL)

Virbac Inc.,  
P.O. Box 162059,  
Fort Worth, TX 76161

**DIRECTIONS FOR USE:** It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Spray over the entire haircoat making sure the coat is thoroughly wetted down to the skin. Spray against the lay of the hair, ruffling the coat on long-haired dogs. Weight of dog, length of hair and density of coat will determine amount of spray to be applied to wet the skin (average dose approximately 1.5 g/kg). This 8 oz. bottle should be sufficient for ten applications at one to two week intervals to an average 30-35 lbs. dog. Lighter applications will reduce period of effectiveness and require more frequent treatment. Allow dog to air dry or blow dry. Do not towel dry.

### PRECAUTIONARY STATEMENT

#### HAZARDS TO HUMANS AND DOMESTIC ANIMALS CAUTION

**HAZARDS TO HUMANS:** May cause eye irritation. Do not get in eyes. Avoid breathing spray mist. Use only in a well ventilated area. Avoid contamination of food. Wash thoroughly with soap and water after using. Remove contaminated clothing and wash before reuse.

**HAZARDS TO ANIMALS: DO NOT USE ON CATS.** Do not use on pups under 3 months of age. Consult a veterinarian before use on pregnant or nursing bitches, or on old, sick or debilitated dogs. Do not spray in eyes, face or on genitalia. Until dry, do not confine treated dog in area without adequate cross ventilation. In the event of adverse reaction, shampoo dog with a non-pesticidal shampoo to remove pesticide residue and consult a veterinarian if reaction persists.

#### PHYSICAL OR CHEMICAL HAZARDS

Do not use or store near heat or open flame.

#### STATEMENT OF PRACTICAL TREATMENT

If in Eyes: Flush with plenty of water. Call a physician if irritation persists.

#### STORAGE AND DISPOSAL

**STORAGE:** Store in a cool area away from heat and open flame.

**DISPOSAL:** Do not reuse empty container. Wrap in several layers of newspaper and discard in trash.

EPA Reg. No. 2382-127 EPA Est. No. 2382-IN-1

Lot no. on bottom of container 96/01