



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

March 10, 2004

Joseph E. Dyer  
Virbac AH, Inc  
P. O. Box 162059  
Fort Worth, TX 76161

Subject: Label Amendment - Updating per PR Notices  
Zema Yard & Kennel Spray Concentrate  
EPA Reg. No. 2382-181  
Your Submission Dated November 12, 2003

Dear Mr Dyer:

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. 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. Revise the Precautionary Statements as follows:
  - a. Delete "Avoid breathing vapors or spray mist."
  - b. Replace "Harmful if swallowed, absorbed through the skin or inhaled" with "Harmful if swallowed or absorbed through the skin."
  - c. Move "Avoid contamination of food and feedstuffs. Do not spray plants used for food or feed." to the Directions for Use.
2. Revise the front panel as follows:
  - a. Replace "Evercide Intermediate 2575" with "Evercide Intermediate 2527"

- b. Replace "that carry and transmit lyme disease" with "that may carry and transmit lyme disease".
- 3. Since the product contains more than 10% petroleum distillate, in the If Swallowed first aid statement, replace "Have person sip a glass of water if able to swallow" with "Do not give any liquid to the person."
- 4. Under Environmental Hazards delete the statement, "For terrestrial uses do not apply directly ..... etc". The statement "Do not apply to any body of water" is appropriate for a residential use product except add the word directly to the statement i.e., "Do not apply directly to any body of water".

Note, base on the inhalation acute toxicity of the product (Tox Category IV), you are not required to have an If inhaled first aid statement. You may delete this statement if you wish. If you have any questions regarding this action, please contact BeWanda Alexander of my team at (703) 305-7460.

Sincerely,



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

3 8 7

DRAFT LABEL  
Front Panel

**ZEMA ESFENVALERATE LAWN SPRAY CONCENTRATE**

- ♦ EMULSIFIABLE CONCENTRATE FOR USE ON LAWNS MADE FROM 25% OF <sup>1</sup>EVERCIDE INTERMEDIATE 2575
- ♦ EMULSIFIABLE CONCENTRATE FOR USE ON LAWNS TO KILL FLEAS AND TICKS AND OTHER OUTDOOR INSECTS LISTED ON THIS LABEL
- ♦ KILLS DEER TICKS AND OTHER IXODID SPECIES THAT CARRY AND TRANSMIT LYME DISEASE
- ♦ FOR USE OUTDOORS ON RESIDENTIAL LAWNS AND AROUND RESIDENTIAL PREMISES ONLY
- ♦ TREATS 11,200 SQ. FT.
- ♦ KILLS FLEAS, TICKS AND OTHER OUTDOOR INSECTS

**ACTIVE INGREDIENTS:**

Esfenvalerate: CAS# 66230-04-4..... 0.44%

<sup>2</sup>OTHER INGREDIENTS:..... 99.56%

TOTAL..... 100.00%

<sup>2</sup>Contains petroleum distillates, xylene range aromatic hydrocarbons.

<sup>1</sup>EVERCIDE® a Registered Trademark of McLaughlin Gormley King Co.

**KEEP OUT OF THE REACH OF CHILDREN  
CAUTION  
SEE BACK PANEL FOR ADDITIONAL  
PRECAUTIONARY STATEMENTS**

Net Contents: 30 FL OZ (887mL)

**ACCEPTED  
with COMMENTS  
In EPA Letter Dated  
MAR 10 2004  
Under the Federal Insecticide,  
Fungicide, and Rodenticide Act,  
as amended, for the pesticide  
registered under EPA Reg. No.  
2382-181**

READ ENTIRE LABEL BEFORE EACH USE

**PRECAUTIONARY STATEMENTS**  
**HAZARDS TO HUMANS AND DOMESTIC ANIMALS**  
**CAUTION**

Causes moderate eye irritation. Harmful if swallowed, absorbed through the skin or inhaled. Avoid breathing vapors or spray mist. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove contaminated clothing and wash before reuse. Avoid contamination of food and feedstuffs. Do not spray plants used for food or feed.

**FIRST AID**

- 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 eyes.
  - Call a poison control center or doctor for 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 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 Swallowed**
- Call a 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 a poison control center or doctor.
  - Do not give anything by mouth to an unconscious person.

**HOT LINE NUMBER**

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 800-XXX-XXXX for emergency medical treatment information.

**NOTE TO PHYSICIAN**

Contains petroleum distillate. Vomiting may cause aspiration pneumonia.

#### ENVIRONMENTAL HAZARDS

This product is extremely toxic to fish and other aquatic animals. Drift from treated areas may be hazardous to organisms in adjacent aquatic sites. For terrestrial uses, do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not apply to any body of water. Do not contaminate water by disposal of equipment washwaters or rinsate. X

#### PHYSICAL OR CHEMICAL HAZARDS

Do not use or store near heat or open flame.

#### DIRECTION FOR USE

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

**LAWN FLEA AND TICK CONTROL:** To kill fleas and ticks harboring in lawns and back yards use this concentrate in a hose-end sprayer. Place required amount of concentrate in sprayer jar (see chart below) and fill with water to the recommended level. Mix well. Attach sprayer to hose and spray as recommended. For best results, lawn should be mowed a day or two before spraying. Spray using a slow, even sweeping motion, being sure to cover the entire lawn surface where the pets will normally frequent. Spray under ornamentals or trees, but avoid soaking young or flowering plants. Repeat treatments may be necessary at 7 to 14 day intervals. Kills on contact the Ixodes dammini tick (deer tick) which may transmit Lyme disease. Also kills foraging fire ants upon direct contact. A registered fire ant mound treatment should also be used in conjunction with this product.

Keep pets and children out of the treated area until after the spray has dried. Do not spray animals. Dogs, cats, their kennel or bedding area should also be treated with a registered flea and tick control product in conjunction with this application.

#### HOSE END SPRAYER APPLICATION

Amount of Product to

Use in Fluid Ounces<sup>3</sup>

Amount of Water

Area to be Treated

3 3/4 fl. oz. (1/8 Bottle)	9 gal	1,400 (70'x 20')
7 1/2 fl. oz. (1/4 Bottle)	17 gal	2,800 (70'x 40')
15 fl. oz. (1/2 Bottle)	34 gal	5,600 (70'x 80')
30 fl. oz. (1 Bottle)	67 gal	11,200 (70'x 160")

<sup>3</sup> Note: 1 fluid ounce = 2 Tablespoons = 6 Teaspoons

**FOR OUTDOOR PESTS:** Mix concentrate in a compressed air sprayer or watering can at a rate of two (2) fluid ounces per one (1) gallon of water to control on contact ants, cockroaches (including German and Asian cockroaches), crickets, palmetto bugs, sowbugs, spiders, and ticks. Use at the rate of one (1) gallon (diluted spray) per 1,000 square feet to outside surfaces of buildings, porches, patios, garages and other areas where these pests have been seen or are found. Do not allow spray to contact ornamental plants or shrubs because of possible injury.

**DIRECTIONS OF USE (CONTINUED)**

**BUILDING PERIMETER TREATMENT:** To help prevent infestations of buildings by ants, centipedes, crickets, sowbugs, and spiders, treat a 12 to 18 inch band of soil or other substrate adjacent to buildings and the building foundation to a height of 2 to 3 feet where these pests are active and may find entrance. Use sixteen (16) fluid ounces of concentrate per gallon of water and apply as a coarse wet spray at the rate of (1) gallon per 1,000 square feet.

**HOSE END SPRAYER INSTRUCTIONS:**

**STEP #1:** Turn water control knob on hose spray to the OFF position.

FIGURE/PICTURE #1

**STEP #2:** Grasp handle and shake thoroughly, turning bottle as you shake.

FIGURE/PICTURE #2

**STEP #3:** Connect hose to spray nozzle.

FIGURE/PICTURE #3

**STEP #4:** Bend safety tab down and turn control to "water".

FIGURE/PICTURE #4

**STEP #5:** Slowly turn on water supply until it reaches a moderate flow.

FIGURE/PICTURE #5

**STEP #5:** Point nozzle toward lawn, turn water control knob to "ON" position.

FIGURE/PICTURE #6

**Note:** This product will automatically mix with water. Slowly sweep the area to be treated. Apply evenly using a back and forth motion. Hold bottle level and always move at a steady pace, spraying directly on insects whenever possible. Average water pressure will empty the bottle in approximately 5 minutes. One bottle is enough to treat up to 11,200 sq. ft. Repeat treatment when needed to maintain effectiveness.

=====

**STORAGE AND DISPOSAL**

=====

**STORAGE:** Store in original container in a cool, dry place (preferably locked) inaccessible to children and pets.

**DISPOSAL:** If **Empty:** Do not reuse this container. Place in trash or offer for recycling if available. If **Partly filled:** Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

=====

EPA Reg. No.: 2382-181

EPA Est. No.: 67517-MO-1

Manufactured By  
Virbac AH, Inc.  
Consumer Brands Division  
Fort Worth, TX 76161  
800-338-3659

(lot number statements as needed)

Mfg. & Printed in U.S.A. (label revision number) (product number)

