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Mr. R. Wayne Moran
ConAgra Pet Products
1405 Cummings Drive
Richmond, VA 23261-6609

Dear Mr. Moran:

Subject: Amendment - Addition of Deer Tick Claim
Sergeant's Indoor Fogger
EPA Registration No. 2517-48
Your Application and Letter Dated October 16, 1989 and April 5, 1990,
respectively

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable provided that you make the labeling changes indicated below prior to release for shipment of product bearing the amended labeling.

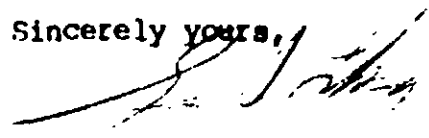
1. Under the subheading "Purpose", delete the word "unique" because it provides a misleading comparison to other fogger devices.

We have received your letter dated April 5, 1990 justifying the need for a deer tick claim for indoor fogger use, as well as, requesting the use of the more generic claim statement "Kills Ticks That Carry Lyme Disease" to identify additional ticks which are vectors of Lyme Disease on the product label. The Agency has no objection to the use of the more generic claim.

Refer to comment 3 of our November 6, 1986 letter and please provide the information as requested.

Submit five (5) copies of your final printed labeling before you release the product for shipment. A stamped copy of the labeling is enclosed for your records.

Sincerely yours,



George T. LaRocca
Product Manager 15
Insecticide-Rodenticide Branch
Registration Division (H7505C)

Enclosure

BEST AVAILABLE COPY

ACCEPTED
with COMMENTS
in EPA Letter Dated:

APR 9 1980

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide
registered under EPA Reg. No. 2517-48



Sergeant's INDOOR FOGGER

Kills Fleas, ticks, lice, ants,
spiders, wasps and roaches.

KILLS THE DEER TICK THAT CARRIES LYME DISEASE

**KILLS PRE-ADULT FLEAS
KEEPS KILLING FOR TWO WEEKS**

ACTIVE INGREDIENTS:	
d-trans Allethrin	0.300%
Related compounds	0.023%
*Cyanol (3-phenylphenyl) methyl 4-chloro-alpha-(1-methylethyl) benzoacetate	0.200%
**INERT INGREDIENTS:	99.477%
*(Contains petroleum distillates)	
	100.00%

*Licensed under U.S. Patent No. 4,062,968
of Sumitomo Chemical Company

NET WT. 6 oz. (170 grams)

Keep Out Of Reach Of Children.
CAUTION
See back panel for directions and precautions.

IMPORTANT

PURPOSE: Sergeant's Indoor Fogger kills fleas, spiders, mosquitoes, ticks, gnats, crickets, cockroaches, and ants. One can treats up to 5,000 sq. ft. of the house. Kitchen, Family Room, and Attic. Also useful if a flea problem exists. This unique fogger kills the whole room with insect-killing fog.

DIRECTIONS FOR USE: It is a non-toxic fogger. Do not use in occupied buildings. For use on vacant buildings, per 5,000 cubic feet of broom units for each room or whole house. Remove all furniture, drapes, and other items from room. Remove pets, birds, and fish. Turn off water or food supply. Open cupboards, drawers, and closets. Cover asphalt tile, concrete, and other items, such as stereo covers, with newspapers. Shut off fans and lights. Activate fogger with down firmly with thumb on side. Cover with newspapers and re-enter building for fogging. Allow to air for 30 minutes. **STORAGE AND DISPOSAL:** Store in original container. Do not reuse empty and discard in trash. Do not reuse.

PRECAUTIONS

CAUTION: Harmful if swallowed, inhaled, or on skin. Wash contaminated skin or clothing. Wash contact surfaces. Flush with plenty of water.

STATEMENT

If swallowed: Call a physician immediately. **INDUCE VOMITING.** Solvent indicated if material taken into stomach. **If inhaled:** Remove victim to fresh air. **If on skin:** Remove contaminated clothing and water. **If in eyes:** Flush with plenty of water.

PHYSICAL AND CHEMICAL

Contents under pressure. Do not puncture or incinerate. Exposure to flame may cause explosion. EPA Reg. No. 2517-48

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ConAgra Pet Products
Omaha, NE 68105
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