

OCT 29 1990

Mr. H.W. Moran
ConAgra Pet Products, Inc.
1405 Cummings Drive
Richmond, VA 23220

Dear Mr. Moran:

SUBJECT: Revision of Lyme's Disease Claim
Sergeant's Flea and Tick Killer & Coat
Conditioning Spray
EPA Reg No. 2517-65
Your Letter Dated September 10, 1990

The labeling for the product referred to above submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable and a stamped copy is enclosed for your records subject to the comments listed below.

1. The statement "No Hydrocarbon Or Fluorocarbon Propellants" must be deleted from the label. Until the Agency develops a policy for allowing such statements to appear on product labels, the above statement is unacceptable.
2. Under the Important Consumer Information paragraph delete the sentence "This product is contained in the revolutionary new Atmos Non-Gas Aerosol delivery system which contains no hydrocarbon or fluorocarbon propellants."
3. The following statements on the front panel of your label must be deleted.
 - a. Revolutionary Non-Gas Aerosol Delivery System
 - b. [Atmos Non-Gas Aerosol]

The above statements must be deleted from the label at this time until the Agency develops a policy of allowing statements such as the above to appear on product labeling.

Submit five copies of final printed labeling incorporating the above statement before you release this product for shipment bearing this label.

Sincerely,

Dennis H. Edwards, Jr.
Product Manager 12
Insecticide-Rodenticide Branch
Registration Division (H-7505C)

Enclosure

FRONT PANEL

**SERGEANT'S
TICK KILLER WITH
COAT CONDITIONER
FOR DOGS**

**KILLS THE TICKS THAT CARRY LYME DISEASE
KILLS FLEAS & TICKS ON DOGS FOR 2 WEEKS
CONTAINS SPECIAL CONDITIONING AGENTS**

CONDITIONS COAT

NON-IRRITATING FORMULA

YOU WILL SEE & FEEL THE DIFFERENCE

PLEASANT FRAGRANCE

REDUCES TANGLES - EASES BRUSHING

PROMOTES HEALTHY COAT

WILL NOT DISCOLOR

NO HYDROCARBON OR FLUOROCARBON PROPELLANTS

EASY APPLICATION

SPRAYS AT ANY ANGLE - EVEN UPSIDE DOWN

REVOLUTIONARY NON-GAS AEROSOL DELIVERY SYSTEM

QUIET APPLICATION / LESS FRIGHTENING TO PET

[ATMOS™ NON-GAS AEROSOL] (trademark logo)

**ACCEPTED
with COMMENTS
in EPA Letter Dated**

OCT 29 1990

**Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
2517-65**

ACTIVE INGREDIENTS:

o-Isopropoxyphenyl methylcarbamate.....0.25%
INERT INGREDIENTS:.....99.75%

KEEP OUT OF REACH OF CHILDREN

CAUTION:

See Back Panel For Directions and Precautions

Contents

BACK PANEL

**SERGEANT'S
TICK KILLER WITH
COAT CONDITIONER
FOR DOGS**

Condition Your Dog's Coat While Killing Fleas & Ticks

IMPORTANT CONSUMER INFORMATION

PURPOSE:

SERGEANT'S TICK KILLER WITH COAT CONDITIONER is specially formulated to kill fleas and ticks quickly and to condition your pet's coat at the same time. Many other flea and tick sprays are harsh and therefore dry your pet's coat and skin. This spray contains special agents that actually return your pet's coat to its shiny, natural luster. This product is contained in the revolutionary new ATMOS™ NON-GAS AEROSOL delivery system which contains no hydrocarbon or fluorocarbon propellants. The product may be sprayed from any angle for ease of application - even upside down! It is also quieter than normal aerosol sprays and, therefore, less frightening to you pet.

DIRECTIONS:

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

Remove cap, thoroughly spray pet (avoiding face and eyes) against the lay of the coat, fluffing long hair so spray reaches the pet's skin. Spray until pet is wet. This bottle should provide 4 to 6 complete treatments, depending on the size of your pet. One treatment will kill fleas and ticks and help protect against infestation for two weeks. Repeat once a week if necessary. Do not repeat more often than once a week. Use on pet's bedding and immediate area to help further reduce flea and tick infestation.

STORAGE AND DISPOSAL:

Store in cool, dry place. To dispose of empty container, replace cap, wrap in newspaper and discard in trash.

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

CAUTION:

Do not spray into eyes. Avoid breathing of spray and avoid contact with human skin. Wash hands after using. Avoid contamination of food and foodstuffs. Contains a cholinesterase inhibitor; Atropine sulfate is antidotal. Harmful if swallowed, inhaled or absorbed through the skin. Avoid breathing of spray mist and provide adequate ventilation of treatment area. Avoid contact with skin, eyes or clothing. Do not use on puppies less than six weeks old.

STATEMENT OF PRACTICAL TREATMENT:

If Swallowed: Call a physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person.

If On Skin: Wash with plenty of soap and water,

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