

2577-80

1-2-2007

1/10



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20466

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

January 2, 2007

James Messina
Agent for Sergeant's Pet Care Products, Inc.
Exponent
1730 Rhode Island Ave., NW
Washington, DC 20036

SUBJECT: Applications for Pesticide Notification
Sergeant's Cyphenothrin + IGR Squeeze-On for Dogs
EPA Reg. No. 2517-80
Applications Dated December 12, 2006 and December 22, 2006

Dear Mr. Messina:

The Agency is in receipt of your Applications for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above products. The Registration Division (RD) has conducted a preliminary screen of these requests for its applicability under PRN 98-10 and finds that the actions requested fall within the scope of PRN 98-10. The labels submitted with the applications have been stamped "Notification" and will be placed in our records.

If you have any questions, please me directly at 703-305-6249 or Terri Stowe of my staff at 703-305-6117.

Sincerely,

A handwritten signature in cursive script that reads "Rachel C. Halloran".

for Linda Arrington
Notifications & Minor Formulations Team Leader
Registration Division (7505P)
Office of Pesticide Programs

Exponent

NOTIFICATION

JAN 02 2007

Exponent
1730 Rhode Island Ave., NW
Suite 1100
Washington, DC 20036

telephone 202-772-4900
facsimile 202-772-4979
www.exponent.com

December 12, 2006

Sherada Hobgood
Document Processing Desk
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
Office of Pesticide Programs (7504P)
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501
(703) 305-5264

Subject: Submission of a Notification for
Sergeant's Cyphenothrin + IGR Squeeze-On for Dogs (EPA Reg. No. 2517-80)
Project No. WD00758.000

Dear Ms. Hobgood:

On behalf of Sergeant's Pet Care Products, Inc. (2637 South 158 Plaza, Suite 100, Omaha, NE 68130), Exponent is submitting a label notification for the EPA registered product Sergeant's Cyphenothrin + IGR Squeeze-On for Dogs (EPA Reg. No. 2517-80), containing the EPA registered active ingredients cyphenothrin and pyriproxyfen. Please find the following information enclosed in support of this application package:

- EPA Form 8570-1;
- Three copies of the revised product label (one with all notification changes highlighted).

The purpose of this notification is to revise the following:

- Update the In Case of Emergency phone number to read, "In Case of an Emergency: call 1-800-781-4736. Non-Emergency: call 1-800-244-PETS (7387)"
- Update the hotline number to read, "You may also contact 1-800-781-4738 for emergency medical treatment information"

We have not included a confidential statement of formula with this submission, as it has not changed in anyway.

Pursuant to PR Notice 98-10, I certify this notification is consistent with the provisions of PR Notice 98-10 and EPA regulations 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula

2/10

Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060. Approval expires 2-28-



United States
Environmental Protection Agency
 Washington, DC 20460

Registration
 Amendment
 Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 2517-80	2. EPA Product Manager S. Hobgood	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Sergeant's Cyphenothrin+IGR Spot-On for Dogs	PM#	
5. Name and Address of Applicant (Include ZIP Code) Sergeant's Pet Care Products, Inc. 2637 South 158th Plaza Omaha, NE 68130 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

NOTIFICATION

Submission of final printed label pursuant to PR Notice 98-10.

JAN 02 2007

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> Text <input type="checkbox"/> No		<input type="checkbox"/> Metal	<input type="checkbox"/> Plastic
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled				<input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)

Name James Messina	Title Authorized Representative	Telephone No. (Include Area Code) 202-772 4932
-----------------------	------------------------------------	---

Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		R. Date Application Received (Stamped)
2. Signature 	3. Title Authorized Representative	
4. Typed Name James Messina	5. Date December 12, 2006	

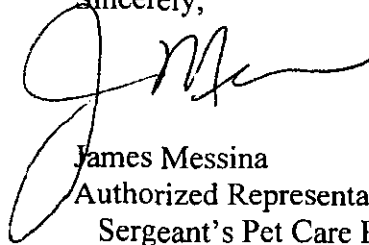
S. Hobgood
December 12, 2006
Page 2

4/10

of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

If you have any questions, please contact me at (202) 772-4932.

Sincerely,



James Messina
Authorized Representative of
Sergeant's Pet Care Products, Inc.

Enclosures

cc: Larry Nouvel, Nouvel Associates
Kelly Hoskins, Sergeants
Sherri Gray, Exponent
Bonnielin Scurman, Exponent

Ex

5/10

NOTIFICATION

JAN 02 2007

[CARTON LABEL - DRAFT MASTER LABEL COPY]

Sergeant's Cyphenothrin+IGR Squeeze-On for Dogs
[(ABN) Sergeant's Gold Flea and Tick Squeeze-On for Dogs]
[(ABN) Sergeant's Gold Squeeze-On for Dogs]
[(ABN SentryPro XFC Squeeze-On for Dogs]
[(ABN) SentryPro XFC Flea and Tick Squeeze-On for Dogs]

- **DO NOT USE ON CATS [Box/Icon with Cat Image and Cross-Out]**
 - [• Flea & Tick Control for Dogs & Puppies 12 weeks old and older]
 - [• [12 week],[16],[20], [24][28] [32] [52] Week Supply For Dogs weighing [more than 9 lbs],[9 to 20 lbs], [21 to 39 lbs] [40 to 60 lbs] [61 lbs and over]*
 - [Works up to [4] [four] Weeks!]
 - [Protects for up to [4] [Four] Weeks!]
 - [Kills fleas, ticks, mosquitoes, flea eggs, and flea larvae]
 - [• [Five] [5] Way Protection [Kills fleas, ticks, mosquitoes, flea eggs & flealarvae]]*
 - [• Five Way Protection! Kills ticks, mosquitoes fleas, flea eggs & flea larvae]*
 - [• 5 Way Protection! Kills ticks, mosquitoes, fleas, flea eggs & flea larvae]*
 - [• [4 Week] [Flea Tick & Treatment]*
 - [• [Four (4) Week] [Flea and Tick Control]]*
 - [• With Nylar® Insect Growth Regulator which Breaks the Flea Life Cycle]*
 - [• With Nylar® to Break Flea Life Cycle]*
 - [• With Insect Growth Regulator to Break Flea Life Cycle]*
 - [• Dual Action [!]: Cyphenothrin with Nylar® IGR Effectively Breaks the Flea Life Cycle]*
 - [• Dual Action [!]: Effectively Breaks the Flea Life Cycle[!]]*
 - [• For Dogs & Puppies (Over 12 Weeks of Age) and greater than 9 lbs.]
 - [• For Dogs & Puppies (Over 12 Weeks of Age) 9 to 20 lbs.]
 - [• For Dogs & Puppies (Over 12 Weeks of Age) 21 to 39 lbs.]
 - [• For Dogs & Puppies (Over 12 Weeks of Age) 40 to 60 lbs.]
 - [• For Dogs & Puppies (Over 12 Weeks of Age) 61 lbs and Over]
 - [• Three Applications {for cartons with 3 applicators}} and/or [3 Month Supply] or [12 Week Supply]
 - [• For Dogs [more than 9 lbs.] or [9 lbs. to 20 lbs.] or [21 lbs. to 39 lbs.] or [40 lbs. to 60 lbs.] or [61 lbs. and Over]]
 - [• Breaks Flea Life Cycle!]*for up to 9 weeks]
 - [Controls reinfestation for up to 9 weeks!]
 - [• Best if used year round!]
 - [• Kills & Repels Fleas Up to [4 weeks]!]*
 - Kills [& Repels] fleas in as little as 1 hour!]
 - Kills [& Repels] ticks in as little as 3 hours!]
 - [Kills fleas [in as little as 1 hour], ticks [in as little as 3 hours], [mosquitoes], [flea eggs & flea larvae]
 - [Kills [and Repels]]
 - Fleas [in as little as 1 hour]

6/10

- Ticks [in as little as 3 hours]
- [Mosquitoes]
- [Kills for [9 weeks] [63 days]]
 - [flea eggs]
 - [flea larvae]
- [(ICON Showing 4 Week Protection)]
- [4 Week Dose!]
- [1 Month Dose!]
- [Prevents ticks from attaching and feeding in as little as 3 hours after application]
- [Kills and Detaches Ticks]
- [Easy to Use Application]
- [Specially Formulated for Dogs and Puppies]
- [4 Week Protection!]
- [[Free] Calendar Stickers Inside!]
- [[Free] Brochure Inside!]
- [[Free] Brochure and Calendar Stickers Inside]
- [Patented Technology]
- [• Kills Flea Eggs & Flea Larvae for more than [63 days], [9 weeks]!]*
- [• Prevents Flea Eggs From Developing Into Biting Adults]*
- [• Kills & Repels Ticks for Up to [4 weeks]!]*
- [• Kills & Repels Deer Ticks (vector of Lyme Disease) for up to 4 weeks]
- [• Kills & Repels Ticks (Including Deer Ticks) for up to 4 weeks]
- [• Kills & Repels Brown Dog Ticks [(*Rhipicephalus sanguineus*)] for up to 4 weeks!]

[CARTON LABEL - MASTER LABEL COPY]

- [• Kills & Repels American Dog Ticks [(*Dermacentor variabilis*)] for up to 4 weeks!]
- [• Apply once every [4 weeks]!]
- [• 4 week Flea and Tick Treatment!]
- [One Month Flea and Tick Treatment]
- [• Kills & Repels Fleas and Ticks for up to 4 weeks!]
- [• Kills all stages of the flea life cycle]
- [• Kills Fleas, Ticks, Flea Eggs & Flea Larvae for up to 4 Weeks]
- [Kills [and Repels] mosquitoes]
- [Dogs can be bathed 24 hours after squeeze-on is applied]

[• May contain graphics illustrating product use, e.g., dog with a drop falling onto its neck from a vial on front, side, or back carton label and/or applicator labeling.]

[] - Denotes Optional Statements and/or Images that May be Used on Front, Back or Side Label Panels

***Note: Underscored Claims To Be Based on New as well as Existing Product Performance (Efficacy) Data**

[Ingredient Statement may be on front or back label]

ACTIVE INGREDIENTS:	
Cyphenothrin (CAS# 39515-40-7)	40.0%
Pyriproxyfen (CAS# 95737-68-1)	2.0%
OTHER INGREDIENTS:	<u>58.0%</u>
TOTAL:	100.0%

Nylar® is a registered trademark of McLaughlin Gormley King Company.
U.S. Patent No. 5,942,525

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

See [Back][or][Side] Label Panel[s] for Additional Precautionary Statements

NET CONTENTS: [THREE] [FOUR] [SIX][TWELVE] 1.5 ml (0.05 oz.)Tubes
[THREE][FOUR][SIX][TWELVE] 3.0 ml (0.10 oz.)Tubes
[THREE][FOUR][SIX][TWELVE] 4.5 ml (0.15 oz)Tubes
[THREE][FOUR][SIX][TWELVE] 6.0 ml (0.20 oz.)Tubes

[BACK/SIDE CARTON LABEL - MASTER LABEL]

**READ ENTIRE LABEL BEFORE EACH USE.
USE ONLY ON DOGS AND PUPPIES OVER 12 WEEKS OF AGE.
DO NOT USE ON CATS**

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

CAUTION: Causes moderate eye irritation. Harmful if swallowed or absorbed through skin. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling.

FIRST AID	
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 or doctor for treatment advice.

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 in eyes	<ul style="list-style-type: none"> • 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 eye. • Call a poison control center or doctor for treatment advice.
<p>HOTLINE NUMBER</p> <p>Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-781-4738 for emergency medical treatment information.</p>	
<p>NOTE TO PHYSICIAN OR VETERINARIAN</p> <p>Treat patient symptomatically</p>	

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. **DO NOT USE ON CATS.** May be toxic and potentially fatal if applied to or ingested by cats.

FOR EXTERNAL USE ON DOGS ONLY. Do not use on puppies under 12 weeks of age. Best if used year round. Consult a veterinarian before using this product on debilitated, aged, medicated, pregnant, or nursing dogs. Consult a veterinarian before using on dogs with known organ dysfunction. **DO NOT USE ON CATS** or animals other than dogs. Cats that actively groom or engage in close physical contact with treated dogs may be at risk of serious harmful effects. Sensitivities may occur after using ANY pesticide product on pets. If signs of sensitivity occur bathe your dog with a mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately.

How to apply: Remove product tube from package. Holding tube with top end pointing up and away from face and body, [snap or] cut off top end. Invert tube over dog and use open end to part dog's hair. Squeeze tube firmly to apply all of the solution to the dog's skin, as directed below. Repeat application may be made if necessary, but do not apply more often than once every 4 weeks.

[BACK/SIDE CARTON LABEL - MASTER LABEL]

For Dogs Weighing Between 9 and 20 lbs.: {For cartons containing 1.5 ml applicator tubes}
Apply one tube (1.5 ml)(0.05 oz.) as a spot to the dog's back between the shoulder blades [from the back of the neck to a point midway between the neck and tail].

For Dogs Weighing Between 21 and 39 lbs. {For cartons containing at least two 1.5 ml applicator tubes, or at least one 3.0 ml applicator tube}

9/10

[Apply two tubes (1.5 ml)(0.05 oz.) as a spot on the dog's back between the shoulder blades] or [Apply one tube (3.0 ml)(0.05 oz.) as a spot to the dog's back between the shoulder blades.]

For Dogs Weighing Between 40 and 60 lbs. {For cartons containing at least three 1.5 ml applicator tubes, or at least one 4.5 ml applicator tube}

[Apply two tubes (1.5 ml)(0.05 oz.) as a spot to the dog's back between the shoulder blades and apply the third tube. from the back of the neck to a point midway between the neck and tail]. - or - [Apply one tube (4.5 ml)(0.15 oz.) from the back of the neck to a point midway between the neck and tail].

For Dogs Weighing 61 lbs. and Over: {For cartons containing at least two 3.0 ml applicator tubes, or at least one 6.0 ml applicator tube}

[Apply the first tube (3.0 ml)(0.10 oz.) as a spot to the dog's back between the shoulder blades and apply the contents of the other tube (3.0 ml each)(0.10 oz.) from the back of the neck to a point midway between the neck and tail.] - or - [Apply one tube (6.0 ml)(0.20 oz.) from the back of the neck to a point midway between the neck and tail.]

STORAGE AND DISPOSAL

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

STORAGE: Do not remove tube from the pack until ready to use. Store in a cool (below 25°C) dry place inaccessible to children and pets. Do not refrigerate. Protect from direct sunlight.

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.

[Sergeant's Squeeze-On Flea & Tick Control with Nylar® Insect Growth Regulator is an effective and easy to use product.] [Sergeant's Squeeze-On Flea & Tick Control with Nylar® Insect Growth Regulator prevents eggs from fleas on treated dogs from developing into biting adults for 63 days.] [7 weeks][As with all flea and tick control products, [Sergeant's Squeeze-On Flea and Tick Control with Nylar® Insect Growth Regulator] should be used as part of a program aimed at reducing flea populations in the dog's environment (bedding, carpets, kennel, yard).] [Consult your retailer for program recommendations.]

[BACK/SIDE CARTON LABEL - MASTER LABEL]

www.sergeants.com

MADE IN USA

Sergeant's is committed to providing high quality products. If you have questions or comments about this product, please write: Sergeant's Consumer Response; P.O. Box 54(399); Omaha, NE 68154-0399.

[Satisfaction Guaranteed!] [Please return for a refund if not completely satisfied!]

In Case of Emergency: call 1-800-781-4738. Non-Emergency: call 1-800-224-PETS (7387).

10/10

[WARRANTY: SERGEANT'S PET CARE, INC. MAKES NO WARRANTY OF MERCHANTABILITY, FITNESS FOR ANY PARTICULAR PURPOSE, OR OTHERWISE, EXPRESSED OR IMPLIED, CONCERNING THIS PRODUCT OR ITS USES WHICH EXTEND BEYOND THE USE OF THE PRODUCT UNDER NORMAL CONDITIONS IN ACCORDANCE WITH THE STATEMENTS MADE ON THIS LABEL.]

Made in the USA For:
Sergeant's Pet Care Products, Inc.
Omaha, NE 68130
EPA Reg. No. 2517 -80
EPA Est. No. XXXXX -XX -XXX
[TUBE/APPLICATOR LABEL]

[BAR CODE AREA]

FRONT PANEL -

Sergeant's Squeeze-On Flea & Tick Control with Nylar® Insect Growth Regulator, [Box/Icon with Cat Image and Cross-Out], [1.5 ml][0.05 oz.] or [3.0 ml][0.10 oz.] or [4.5 ml][0.15 oz.] or [6.0 ml][0.20 oz.], Cyphenothrin 40.0% W/W, Pyriproxyfen 2.0% W/W

BACK PANEL -

READ DIRECTIONS/PRECAUTIONS BEFORE USING.
CAUTION: KEEP OUT OF REACH OF CHILDREN
EPA REG. NO. 2517-80

NEXT

LABEL

2517-80

1-2-2007

1/10



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

January 2, 2007

James Messina
Agent for Sergeant's Pet Care Products, Inc.
Exponent
1730 Rhode Island Ave., NW
Washington, DC 20036

SUBJECT: Applications for Pesticide Notification
Sergeant's Cyphenothrin + IGR Squeeze-On for Dogs
EPA Reg. No. 2517-80
Applications Dated December 12, 2006 and December 22, 2006

Dear Mr. Messina:

The Agency is in receipt of your Applications for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above products. The Registration Division (RD) has conducted a preliminary screen of these requests for its applicability under PRN 98-10 and finds that the actions requested fall within the scope of PRN 98-10. The labels submitted with the applications have been stamped "Notification" and will be placed in our records.

If you have any questions, please me directly at 703-305-6249 or Terri Stowe of my staff at 703-305-6117.

Sincerely,

Linda Arrington
Notifications & Minor Formulations Team Leader
Registration Division (7505P)
Office of Pesticide Programs

2/10

Print Form

Please read instructions on reverse before completing form.

Form Approved, OMB No. 2070-0060, Approval expires 2-28-



United States
Environmental Protection Agency
Washington, DC 20460

Registration
 Amendment
 Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 2517-80	2. EPA Product Manager G. LaRocca	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Sergeant's Cyphenothrin+IGR Squeeze-On for Dogs	PM# 13	
5. Name and Address of Applicant (Include ZIP Code) Sergeant's Pet Care Products, Inc. 2637 South 158th Plaza, Suite 100 Omaha, NE 68130 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

NOTIFICATION

JAN 02 2007

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Submission of a label notification pursuant to PR Notice 98-10 to correct several typographical errors.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> Text <input type="checkbox"/> No			<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name James Messina	Title Authorized Representative	Telephone No. (Include Area Code) 202-772-4732
<p align="center">Certification</p> <p>I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.</p>		6. Date Application Received (Stamped)
2. Signature 	3. Title Authorized Representative	
4. Typed Name James Messina	5. Date December 22, 2006	

Exponent

NOTIFICATION

JAN 02 2007

3/10
Exponent
1730 Rhode Island Ave., NW
Suite 1100
Washington, DC 20036

telephone 202-772-4900
facsimile 202-772-4979
www.exponent.com

December 22, 2006

Sherada Hobgood
Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501
(703) 305-5264

Subject: Submission of a Notification for
Sergeant's Cyphenothrin + IGR Squeeze-On for Dogs (EPA Reg. No. 2517-80)
Project No. WD00758.000

Dear Ms. Hobgood:

On behalf of Sergeant's Pet Care Products, Inc. (2637 South 158 Plaza, Suite 100, Omaha, NE 68130), Exponent is submitting a label notification for the EPA registered product Sergeant's Cyphenothrin + IGR Squeeze-On for Dogs (EPA Reg. No. 2517-80), containing the EPA registered active ingredients cyphenothrin and pyriproxyfen. Please find the following information enclosed in support of this application package:

- EPA Form 8570-1; and
- Three copies of the revised product label.

We have corrected several typographical errors in the enclosed label, including the addition of the application text for the weight group of 21-39 pounds, "Apply one tube (3.0 ml)(0.10 fl. oz.) from the back of the neck to a point midway between the neck and tail." This text is found in all of the other application weight groups and was mistakenly left off of this specific weight group. All changes have been highlighted in the enclosed label. We have not included a confidential statement of formula with this submission, as it has not changed in anyway.

Pursuant to PR Notice 98-10, I certify this notification is consistent with the provisions of PR Notice 98-10 and EPA regulations 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to

4/10

S. Hobgood
December 22, 2006
Page 2

willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

If you have any questions, please contact me at (202) 772-4932.

Sincerely,



James Messina
Authorized Representative of
Sergeant's Pet Care Products, Inc.

Enclosures

cc: Larry Nouvel, Nouvel Associates
Kelly Hoskins, Sergeants
Susan Kane, Sergeants

Ex

JAN 02 2007

[CARTON LABEL - DRAFT MASTER LABEL COPY]

Sergeant's Cyphenothrin+IGR Squeeze-On for Dogs
[(ABN) Sergeant's Gold Flea and Tick Squeeze-On for Dogs]
[(ABN) Sergeant's Gold Squeeze-On for Dogs]
[(ABN) SentryPro XFC Squeeze-On for Dogs]
[(ABN) SentryPro XFC Flea and Tick Squeeze-On for Dogs]

• **DO NOT USE ON CATS [Box/Icon with Cat Image and Cross-Out]**

- [• Flea & Tick Control for Dogs & Puppies 12 weeks old and older]
- [• [12 week],[16],[20], [24][28] [32] [52] Week Supply For Dogs weighing {more than 9 lbs.}[9 to 20 lbs], [21 to 39 lbs] [40 to 60 lbs] [61 lbs and over]*
- [Works up to [4] [four] Weeks!]
- [Protects for up to [4] [Four] Weeks!]
- [Kills fleas, ticks, mosquitoes, flea eggs, and flea larvae]
- [• [Five] [5] Way Protection [Kills fleas, ticks, mosquitoes, flea eggs & flea larvae]*
- [• Five Way Protection! Kills ticks, mosquitoes, fleas, flea eggs & flea larvae]*
- [• 5 Way Protection! Kills ticks, mosquitoes, fleas, flea eggs & flea larvae]*
- [• [4 Week] [Flea Tick & Treatment]*
- [• [Four (4) Week] [Flea and Tick Control]*
- [• With Nylar® Insect Growth Regulator which Breaks the Flea Life Cycle]*
- [• With Nylar® to Break Flea Life Cycle]*
- [• With Insect Growth Regulator to Break Flea Life Cycle]*
- [• Dual Action [!]: Cyphenothrin with Nylar® IGR Effectively Breaks the Flea Life Cycle]*
- [• Dual Action [!]: Effectively Breaks the Flea Life Cycle[!]*
- [• For Dogs & Puppies (Over 12 Weeks of Age) and greater than 9 lbs.]
- [• For Dogs & Puppies (Over 12 Weeks of Age) 9 to 20 lbs.]
- [• For Dogs & Puppies (Over 12 Weeks of Age) 21 to 39 lbs.]
- [• For Dogs & Puppies (Over 12 Weeks of Age) 40 to 60 lbs.]
- [• For Dogs & Puppies (Over 12 Weeks of Age) 61 lbs and Over]
- [• Three Applications {for cartons with 3 applicators}} and/or [3 Month Supply] or [12 Week Supply]
- [• For Dogs [more than 9 lbs.] or [9 lbs. to 20 lbs.] or [21 lbs. to 39 lbs.] or [40 lbs. to 60 lbs.] or [61 lbs. and Over]]
- [• Breaks Flea Life Cycle!]*for up to 9 weeks]
- [Controls reinfestation for up to 9 weeks!]
- [• Best if used year round!]
- [• Kills & Repels Fleas Up to [4 weeks]!]*
- Kills [& Repels] fleas in as little as 1 hour!
- Kills [& Repels] ticks in as little as 3 hours!
- [Kills fleas [in as little as 1 hour], ticks [in as little as 3 hours], [mosquitoes], [flea eggs & flea larvae]
- [Kills [and Repels]]

6/10

- Fleas [in as little as 1 hour]
- Ticks [in as little as 3 hours]
- [Mosquitoes]
- [Kills for [9 weeks] [63 days]]
 - [flea eggs]
 - [flea larvae]
- [(ICON Showing 4 Week Protection)]
- [4 Week Dose!]
- [1 Month Dose!]
- [Prevents ticks from attaching and feeding in as little as 3 hours after application]
- [Kills and Detaches Ticks]
- [Easy to Use Application]
- [Specially Formulated for Dogs and Puppies]
- [4 Week Protection!]
- [[Free] Calendar Stickers Inside!]
- [[Free] Brochure Inside!]
- [[Free] Brochure and Calendar Stickers Inside]
- [Patented Technology]
- [• Kills Flea Eggs & Flea Larvae for more than [63 days], [9 weeks]!]*
- [• Prevents Flea Eggs From Developing Into Biting Adults]*
- [• Kills & Repels Ticks for Up to [4 weeks]!]*
- [• Kills & Repels Deer Ticks (vector of Lyme Disease) for up to 4 weeks]
- [• Kills & Repels Ticks (Including Deer Ticks) for up to 4 weeks]
- [• Kills & Repels Brown Dog Ticks [(*Rhipicephalus sanguineus*)] for up to 4 weeks!]

[CARTON LABEL - MASTER LABEL COPY]

- [• Kills & Repels American Dog Ticks [(*Dermacentor variabilis*)] for up to 4 weeks!]
- [• Apply once every [4 weeks]!]
- [• 4 week Flea and Tick Treatment!]
- [One Month Flea and Tick Treatment]
- [• Kills & Repels Fleas and Ticks for up to 4 weeks!]
- [• Kills all stages of the flea life cycle]
- [• Kills Fleas, Ticks, Flea Eggs & Flea Larvae for up to 4 Weeks]
- [Kills [and Repels] mosquitoes]
- [Dogs can be bathed 24 hours after squeeze-on is applied]

[• May contain graphics illustrating product use, e.g., dog with a drop falling onto its neck from a vial on front, side, or back carton label and/or applicator labeling.]

[] - Denotes Optional Statements and/or Images that May be Used on Front, Back or Side Label Panels

***Note:** Underscored Claims To Be Based on New as well as Existing Product Performance (Efficacy) Data

[Ingredient Statement may be on front or back label]

ACTIVE INGREDIENTS:

Cyphenothrin (CAS# 39515-40-7) 40.0%

Pyriproxyfen (CAS# 95737-68-1) 2.0%

OTHER INGREDIENTS: 58.0%

TOTAL: 100.0%

Nylar® is a registered trademark of McLaughlin Gormley King Company.
U.S. Patent No. 5,942,525

KEEP OUT OF REACH OF CHILDREN

CAUTION

See [Back][or][Side] Label Panel[s] for Additional Precautionary Statements

NET CONTENTS: [THREE] [FOUR] [SIX][TWELVE] 1.5 ml (0.05 fl. oz.) Tubes
[THREE][FOUR][SIX][TWELVE] 3.0 ml (0.10 fl. oz.) Tubes
[THREE][FOUR][SIX][TWELVE] 4.5 ml (0.15 fl. oz.) Tubes
[THREE][FOUR][SIX][TWELVE] 6.0 ml (0.20 fl. oz.) Tubes

[BACK/SIDE CARTON LABEL - MASTER LABEL]

**READ ENTIRE LABEL BEFORE EACH USE.
USE ONLY ON DOGS AND PUPPIES OVER 12 WEEKS OF AGE.
DO NOT USE ON CATS**

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Harmful if swallowed or absorbed through skin. Wash thoroughly with soap and water after handling.

8/10

FIRST AID	
If in eyes	<ul style="list-style-type: none"> • 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 eye. • Call a poison control center or doctor for treatment advice.
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.
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.
HOTLINE 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 1-800-781-4738 for emergency medical treatment information.	
NOTE TO PHYSICIAN OR VETERINARIAN	
Treat patient symptomatically	

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. **DO NOT USE ON CATS.** May be toxic and potentially fatal if applied to or ingested by cats.

FOR EXTERNAL USE ON DOGS ONLY. Do not use on puppies under 12 weeks of age. Best if used year round. Consult a veterinarian before using this product on debilitated, aged, medicated, pregnant, or nursing dogs. Consult a veterinarian before using on dogs with known organ dysfunction. **DO NOT USE ON CATS** or animals other than dogs. Cats that actively groom or engage in close physical contact with treated dogs may be at risk of serious harmful effects. Sensitivities may occur after using ANY pesticide product on pets. If signs of sensitivity occur bathe your dog with a mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately.

How to apply: Remove product tube from package. Holding tube with top end pointing up and away from face and body, [snap or] cut off top end. Invert tube over dog and use open end to part dog's hair. Squeeze tube firmly to apply all of the solution to the dog's skin, as directed below. Repeat application may be made if necessary, but do not apply more often than once every 4 weeks.

9/10

[BACK/SIDE CARTON LABEL - MASTER LABEL]

For Dogs Weighing Between 9 and 20 lbs.: {For cartons containing 1.5 ml (0.05 fl. oz.) applicator tubes}

Apply one tube (1.5 ml)(0.05 fl. oz.) [as a spot to the dog's back between the shoulder blades] [from the back of the neck to a point midway between the neck and tail].

For Dogs Weighing Between 21 and 39 lbs. {For cartons containing at least two 1.5 ml (0.05 fl. oz.) applicator tubes, or at least one 3.0 ml (0.10 fl. oz.) applicator tube}

[Apply two tubes (1.5 ml)(0.05 fl. oz.) as a spot on the dog's back between the shoulder blades] or [Apply one tube (3.0 ml)(0.10 fl. oz.) as a spot to the dog's back between the shoulder blades.] [Apply one tube (3.0 ml)(0.10 fl. oz.) from the back of the neck to a point midway between the neck and tail.]

For Dogs Weighing Between 40 and 60 lbs. {For cartons containing at least three 1.5 ml (0.05 fl. oz.) applicator tubes, or at least one 4.5 ml (0.15 fl. oz.) applicator tube}

[Apply two tubes (1.5 ml)(0.05 fl. oz.) as a spot to the dog's back between the shoulder blades and apply the third tube from the back of the neck to a point midway between the neck and tail. - or - [Apply one tube (4.5 ml)(0.15 fl. oz.) from the back of the neck to a point midway between the neck and tail].

For Dogs Weighing 61 lbs. and Over: {For cartons containing at least two 3.0 ml (0.10 fl. oz.) applicator tubes, or at least one 6.0 ml (0.20 fl. oz.) applicator tube}

[Apply the first tube (3.0 ml)(0.10 fl. oz.) as a spot to the dog's back between the shoulder blades and apply the contents of the other tube (3.0 ml each)(0.10 fl. oz.) from the back of the neck to a point midway between the neck and tail.] - or - [Apply one tube (6.0 ml)(0.20 fl. oz.) from the back of the neck to a point midway between the neck and tail.]

STORAGE AND DISPOSAL

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

STORAGE: Do not remove tube from the pack until ready to use. Store in a cool (below 25°C) dry place inaccessible to children and pets. Do not refrigerate. Protect from direct sunlight.

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

[Sergeant's Squeeze-On Flea & Tick Control with NyLar® Insect Growth Regulator is an effective and easy to use product.] [Sergeant's Squeeze-On Flea & Tick Control with NyLar® Insect Growth Regulator prevents eggs from fleas on treated dogs from developing into biting adults for 63 days.] [7 weeks][As with all flea and tick control products, [Sergeant's Squeeze-On Flea and Tick Control with NyLar® Insect Growth Regulator] should be used as part of a program aimed at reducing flea populations in the dog's environment (bedding, carpets, kennel, yard).] [Consult your retailer for program recommendations.]

[BACK/SIDE CARTON LABEL - MASTER LABEL]

Visit us at www.sergeants.com

MADE IN THE USA

Sergeant's is committed to providing high quality products. If you have questions or comments about this product, please write: Sergeant's Consumer Response; P.O. Box 540399; Omaha, NE 68154-0399.

[Satisfaction Guaranteed!] [Please return for a refund if not completely satisfied!]

In Case of Emergency, call 1-800-781-4738. Non-Emergency: call 1-800-224-PETS (7387).

[WARRANTY: SERGEANT'S PET CARE, INC. MAKES NO WARRANTY OF MERCHANTABILITY, FITNESS FOR ANY PARTICULAR PURPOSE, OR OTHERWISE, EXPRESSED OR IMPLIED, CONCERNING THIS PRODUCT OR ITS USES WHICH EXTEND BEYOND THE USE OF THE PRODUCT UNDER NORMAL CONDITIONS IN ACCORDANCE WITH THE STATEMENTS MADE ON THIS LABEL.]

[Made in the USA For:]

[Manufactured by:]

Sergeant's Pet Care Products, Inc.

Omaha, NE 68130

EPA Reg. No. 2517 -80

EPA Est. No. 2517-TN-1

[BAR CODE AREA]

[TUBE/APPLICATOR LABEL]

FRONT PANEL -

Sergeant's Squeeze-On Flea & Tick Control with Nylar® Insect Growth Regulator, [Box/Icon with Cat Image and Cross-Out], [1.5 ml][0.05 fl. oz.] or [3.0 ml][0.10 fl. oz.] or [4.5 ml][0.15 fl. oz.] or [6.0 ml][0.20 fl. oz.], Cyphenothrin 40.0% W/W, Pyriproxyfen 2.0% W/W

BACK PANEL -

READ DIRECTIONS/PRECAUTIONS BEFORE USING.

CAUTION: KEEP OUT OF REACH OF CHILDREN

EPA REG. NO. 2517-80