

2517-96

10/21/2008

1/4



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460-0001

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

October 21, 2008

Mr. Kelly R. Hoskins,  
Manager of Technical Affairs  
Sergeant's Pet Products, Inc.  
2625 South 158<sup>th</sup> Plaza  
Omaha, NE 68130-1770

**Subject: Rebuttal to EPA Label Review & Updates per PR Notice 2007-4  
Sergeant's Ear Mite & Tick Control for Dogs and Cats, EPA Reg. No. 2517-96  
Your Submission Dated September 23, 2008**

Dear Mr. Hoskins:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable with the following provision(s):

Storage and Disposal Statement section comment(s):

1. To facilitate inclusion of language from PR Notice 2007-4, replace the first part of the "Disposal:" subsection with: "**Pesticide Disposal: If empty:** Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available."

Warranty & Disclaimer section comment(s):

2. Within forty-five (45) days from the date of this letter, Sergeant's Pet Products, Inc. should submit a label amendment revising the "**WARRANTY**" section (label statement on page 3 of 3 in accordance with the guidance document entitled, "Guidance on Warranty Statements," dated October 17, 2006. This update can be found at the following hyperlink: <http://www.epa.gov/pesticides/regulating/labels/warranty.pdf>.

A copy of your label stamped "Accepted with Comments" is enclosed for your records. Please submit two (2) copies of the final printed labeling, incorporating the above changes, before releasing the product for shipment. If these conditions are not complied with, the registration will be subject to cancellation in accordance with section 6(e) of FIFRA. Your release for shipment of the product bearing amended labeling constitutes accepting of these conditions.

If you have any questions about this label review, please contact Mr. Carmen J. Rodia, Jr. at (703) 306-0327 or via e-mail at [Rodia.Carmen@epa.gov](mailto:Rodia.Carmen@epa.gov).

Sincerely Yours,

Richard J. Gebken  
Product Manager (10)  
Insecticide Branch  
Registration Division (7505P)

Enclosure: Label stamped "Accepted with Comments"

002517-00096 D401047

# Sergeant's Master Label

09 September 2008 corrections  
Information in [ ] is optional.

Page 1 of 3

EPA Reg. No. 2517-96  
EPA SAL 05 March 2007

2/4

**FRONT PANEL**

**EAR MITE & TICK CONTROL**

**Pyrethrins & Piperonyl butoxide, technical**

[Optional text appears in brackets – the final label may include some or all of the optional text on front, back or side label panels]

**{Brand Name}**  
**Ear Mite & Tick Control**  
**For [Dogs] [&] [Cats].**

- {ABN: Sergeant's® Vetscription Ear Mite for Dogs}
- {ABN: Sergeant's® Vetscription Ear Mite for Cats}
- {ABN: Sergeant's® Vetscription Ear Mite for Dogs and Cats}
- {ABN: Sentry HC Mite X for Dogs}
- {ABN: Sentry HC Mite X for Cats}
- {ABN: Sentry HC Mite X for Dogs and Cats}

**ACCEPTED**  
With **COMMENTS**  
In EPA Letter Dated:  
*October 21, 2008*  
Under the Federal Insecticide, Fungicide  
and Rodenticide Act, As amended, for the  
pesticide Registered under EPA Reg. No:  
2517-96

- [Contains Aloe]
- [For use on [Dogs] [&] [Cats]
- [To] [Kills Ticks and Ear Mites]

{Ingredient Statement may be on front or back label}

**ACTIVE INGREDIENTS:**

Pyrethrins .....	0.06%
Piperonyl Butoxide Technical * .....	0.60%

<b>OTHER INGREDIENTS**:</b> .....	<b>99.34%</b>
<b>[TOTAL]</b>	<b>100.00%</b>

\* Equivalent to 0.480% of (butylcarbityl) (6-propylpiperonyl) ether and up to 0.12% related compounds.

\*\*Contains petroleum distillates.

**KEEP OUT OF REACH OF CHILDREN**  
**CAUTION**

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

NET [WEIGHT] [CONTENTS]      XXX oz (XXX mL)

# Sergeant's Master Label

09 September 2008 corrections  
Information in [ ] is optional.

Page 2 of 3

EPA Reg. No. 2517-96  
EPA SAL 05 March 2007

3/4

**BACK PANEL**

**EAR MITE & TICK CONTROL**  
**Pyrethrins & Piperonyl butoxide, technical**

## DIRECTIONS FOR USE

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

**READ ENTIRE LABEL BEFORE EACH USE. SHAKE WELL BEFORE USE.**  
**USE ONLY ON [DOGS] [CATS] or [DOGS OR CATS]**

To be used as an aid in eliminating mites and ticks in the ears of [dogs] [cats] or [dogs or cats] and for relief from itching caused by such conditions. Apply 5 drops into ears twice daily until ticks and mites are eliminated. Do not allow children to apply this product. Use other EPA approved products for treatment of mites and ticks outside the ear.

## PRECAUTIONARY STATEMENTS

### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

#### CAUTION

**HUMANS:** Contains Petroleum Distillates. Harmful if swallowed, absorbed through the skin, or inhaled. Avoid contact with skin, eyes or clothing. Avoid breathing vapor or spray mist. Causes moderate eye irritation. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse.

**ANIMALS:** Do not use on animals under 12 weeks of age. Consult a veterinarian before using this product on debilitated, aged, pregnant, nursing or medicated animals. Sensitivities may occur after using ANY pesticide product for pets. If signs of sensitivity occur, bathe your pet with mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately.

FIRST AID	
<b>IF SWALLOWED</b>	<ul style="list-style-type: none"><li>• Immediately call a poison control center or doctor.</li><li>• Do not induce vomiting unless told to do so by a poison control center or doctor.</li><li>• Have a person sip a glass of water if able to swallow.</li><li>• Do not give anything by mouth to an unconscious person.</li></ul>
<b>IF ON SKIN OR CLOTHING:</b>	<ul style="list-style-type: none"><li>• Take off contaminated clothing.</li><li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li><li>• Call a poison control center or doctor for further treatment advice.</li></ul>
<b>IF INHALED:</b>	<ul style="list-style-type: none"><li>• Move person to fresh air.</li><li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.</li><li>• Call a poison control center or doctor for further treatment advice.</li></ul>
<b>IF IN EYES:</b>	<ul style="list-style-type: none"><li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li><li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li><li>• Call a poison control center or doctor for further treatment advice.</li></ul>
<b>NOTE TO PHYSICIAN:</b> Contains petroleum distillates. Vomiting may cause aspiration pneumonia. Have the product container or label with you when calling a poison control center or doctor or going for treatment. For more information on this pesticide product (including health concerns, medical emergencies or pesticide incidents), you may call 1-800-781-4738.	

# Sergeant's Master Label

09 September 2008 corrections  
Information in [ ] is optional.

Page 3 of 3

EPA Reg. No. 2517-96  
EPA SAL 05 March 2007

**BACK PANEL**

**EAR MITE & TICK CONTROL**  
**Pyrethrins & Piperonyl butoxide, technical**

## STORAGE AND DISPOSAL

**PESTICIDE STORAGE:** Keep this product in original container in an area inaccessible to children and pets and away from heat and 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.

## [WARRANTY

Read the entire Directions for Use and Warranty before using this Product. By using this product, user or buyer accepts the following warranty. [[The directions for use of this product are believed to be adequate and must be followed carefully. However, it is impossible to eliminate all risks inherently associated with the use of this product. Unintended consequences may result because of such factors as weather conditions, presence or absence of other materials, or the manner of application, all of which are beyond the control of Sergeant's.] ] Sergeant's is committed to providing high quality products. To the extent consistent with applicable law, Sergeant's makes no warranties, express or implied, of merchantability or of fitness for a particular purpose or otherwise, that extend beyond statements on this label. To the extent consistent with applicable law, Sergeant's, the manufacturer, or the Seller disclaims any liability whatsoever for special, incidental, or consequential damages resulting from the use of this product. To the extent consistent with applicable law, the exclusive remedy of the user or buyer shall not exceed the purchase price paid.]

[If you have questions or comments about this product, please write: Sergeant's Consumer Response, P.O. Box 540399, Omaha, NE 68154-0399.]

In Case of Emergency, call: 1-800-781-4738

Non-Emergency call 1-800-224-PETS (7387) [Made in USA]

Distributed by:

Sergeant's Pet Care Products, Inc.  
Omaha, NE 68130

EPA Reg. No. 2517-96

EPA Est. No. XXXXX-XX-XX

[lot, date & label code] [UPC CODE]

{END - BACK / SIDE PANEL}