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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

October 7, 2008

Mr. Robert Rosenwasser,
Director, Regulatory Affairs
The Hartz Mountain Corporation
400 Plaza Drive
Secaucus, NJ 07094-3688

**Subject: Amended Labeling, Incorporation of Previously Rescinded Notification Language
Hartz® 2 in 1® Plus Seven Month Collar for Dogs, EPA Reg. No. 2596-84
Your Submission Dated July 2, 2008**

Dear Mr. Rosenwasser:

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):

General Statement:

1. Delete all text throughout the label marked with "strikethrough."

Precautionary Statements section, Hazards to Humans and Domestic Animals subsection comment(s):

2. Replace the 4th sentence with: "Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet."

First Aid Statement section, Note to Physicians and Veterinarians subsection comment(s):

3. It is important to note that the "1-800-275-1414" phone number should be available twenty-four (24) hours per day, seven (7) days per week for answering and responding to any medical emergencies or health concerns.
4. In the "Note to Physicians and Veterinarians:" subsection, replace the 1st sentence with: "This product contains tetrachlorvinphos (an organophosphate), which is a cholinesterase inhibitor."

Storage and Disposal Statement section comment(s):

5. To facilitate inclusion of language from PR Notice 2007-1, you should replace this section with:

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage and disposal.
Pesticide Storage: Store this product in a cool, dry place that is inaccessible to children.
Pesticide Disposal: If empty: Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. **If partly filled:** Call your local solid waste agency [or toll free number or website which meets the criteria in paragraph II.E., P.R. Notice 20007-1] for disposal instructions. Never place unused product down any indoor or outdoor drain.

Non-Pesticide Related Claims and Other Optional Text section comment(s):

- 6. In the 9th and 17th non-pesticide related claims, replace the word "safety" with the word "visibility."
- 7. Delete the 18th non-pesticide related claim, since it is an implied safety claim.

Should you wish to add/retain a reference to the company's website on your label, please be aware that the website becomes labeling under FIFRA and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under section 12(a)(1)(E) of FIFRA. 40 CFR §156.10(a)(5) lists examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not be substantially differ from those claims approved through the registration process. Therefore, should the Agency find, or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA-approved registration, the website will be referred to EPA's Office of Enforcement and Compliance Assurance (OECA). As an alternative, you may refer consumers to the company's phone number or e-mail address.

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.

Sincerely Yours,



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

Enclosure: Label stamped "Accepted with Comments"
 002596-00084 D397015

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Hartz® 2 in 1® Plus Seven Month Collar for Dogs

Alternate Brand Name(s)

- Hartz® UltraGuard™ Flea (&) (and) Tick Collar for (Dogs) (&) (and) Puppies
- Hartz® UltraGuard™ Flea (&) (and) Tick Collar for Small Dogs
- Hartz® UltraGuard™ Flea (&) (and) Tick Collar for Large Dogs
- Hartz® UltraGuard™ Reflecting Flea (&) (and) Tick Collar for Dogs (&) (and) Puppies
- Hartz® UltraGuard™ Reflecting Flea (&) (and) Tick Collar for Small Dogs
- Hartz® UltraGuard™ Reflecting Flea (&) (and) Tick Collar for Large Dogs
- Hartz® UltraGuard™ Reflecting Flea (&) (and) Tick Collar for Puppies

- Hartz® Advanced Care™ 2 in 1® 7 Month Flea and Tick Collar for Dogs
- Hartz® Advanced Care™ 2 in 1® 7 Month Flea and Tick Collar for Large Dogs
- Hartz® Advanced Care™ 2 in 1® 7 Month Flea and Tick Collar for Puppies
- Hartz® Advanced Care™ 2 in 1® Reflecting 7 Month Flea and Tick Collar for Dogs
- Hartz® Advanced Care™ 2 in 1® Reflecting 7 Month Flea and Tick Collar for Large Dogs
- Hartz® Advanced Care™ 2 in 1® Reflecting 7 Month Flea and Tick Collar for Puppies
- Hartz® Advanced Care™ 2 in 1® Collar for Dogs
- Hartz® Advanced Care™ 2 in 1® Collar for Large Dogs
- Hartz® Advanced Care™ 2 in 1® Collar for Puppies
- Hartz® Advanced Care™ 2 in 1® Reflecting Collar for Dogs
- Hartz® Advanced Care™ 2 in 1® Reflecting Collar for Large Dogs
- Hartz® Advanced Care™ 2 in 1® Reflecting Collar for Puppies

- Hartz® 2 in 1® Collar for Dogs
- Hartz® 2 in 1® Collar for Large Dogs
- Hartz® 2 in 1® Collar for Puppies
- Hartz® 2 in 1® Reflecting Collar for Dogs

ACCEPTED
with COMMENTS
In EPA Letter Dated
October 7, 2008
Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
2596-84

ACTIVE INGREDIENT:

Tetrachlorvinphos	14.55%
OTHER INGREDIENTS	85.45%
TOTAL	100.00%

CAUTION: Do not let children play with this collar.

See (side) (back) panel(s) for (ingredient statement and) additional precautionary statements.

Hartz® 2 in 1® Plus Seven Month Collar for Dogs

7/1/08

EPA Reg. No.: 2596-84

MASTER LABEL BASED ON 9/16/05 EPA STAMPED APPROVED LABEL

NET CONTENT(S): 1 (white) (pink) (orange) (blue) (yellow) (purple) (red) (grey) (hunter green)(green)(black)(silver)(gold)(reflecting)(reflective) COLLAR, (NET. WT.) (Range from 19 g to 32 g depending on size of animal)

EPA Reg. No. 2596-84

EPA Est. No. 2596-NJ-1

Made (in the U.S.A.) by

The Hartz Mountain Corporation

400 Plaza Drive

Secaucus, NJ 07094 (U.S.A.)

READ ENTIRE LABEL BEFORE EACH USE.
USE ONLY ON DOGS.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if swallowed or absorbed through skin. Causes moderate eye irritation. Avoid contact with eyes, skin, or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco.

FIRST AID

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.

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 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 eye. Call a Poison Control Center or doctor for treatment advice.

Have the product container or label with you when calling a Poison Control Center or doctor, or going for treatment. You may also contact 1-800-275-1414 for emergency medical treatment information.

Note to Physicians and Veterinarians: This product contains an organophosphate and may cause cholinesterase inhibition. Cholinergic symptoms may include salivation, miosis, incoordination, muscle fasciculation and/or weakness, vomiting and diarrhea. Atropine is antidotal. 2-PAM may be effective as an adjunct to atropine. Call 1-800-275-1414 or your local Poison Control Center for further information.

DIRECTIONS FOR USE

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

REMOVE COLLAR FROM PACKAGE, UNROLL AND STRETCH TO ACTIVATE INSECTICIDE GENERATOR. As the collar begins to work, a fine white powder will appear on the surface.

Do not use on puppies under 6 weeks of age. Do not unroll collar until ready to use. Place the (brand name) (collar) around the dog's neck, adjust for proper fit, and buckle in place. The collar must be worn loosely to allow for growth of the dog and to permit the collar to move about the neck. Generally, a properly fitted collar is one that, when fastened, will snugly slide over the dog's head. Leave 2 or 3 inches on the collar for extra adjustment and cut off and dispose of the extra length.

Consult a veterinarian before using this product on debilitated, aged, or medicated animals. If used on pregnant or nursing dogs, do not replace collar until the puppies are at least 6 weeks old. Sensitivity may occur after using ANY pesticide product for pets. Some animals may become irritated by any collar if it is applied too tightly. If this occurs, loosen the collar. If irritation continues, remove the collar from the dog. If signs of sensitivity occur, remove the collar and bathe your pet with mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately. Do not use this product on dogs simultaneously or within 30 days before or after treatment with or exposure to cholinesterase inhibiting drugs, pesticides, or chemicals. However, flea and tick collars may be immediately replaced.

This collar is intended for use only as an insecticide generator.

(Kills fleas and ticks common to dogs, including the Deer tick, which may carry Lyme disease, and the Rocky Mountain wood tick, which may carry Rocky Mountain spotted fever.) The collar will begin to kill fleas and ticks immediately. (Its full protection against harder to kill ticks will be built up within a few days after being placed on the pet.) For continuous flea and tick protection under normal conditions replace the collar every seven months. The collar kills ticks for 5 months and aids in their control an additional 2 months. Under conditions where dogs are exposed to severe flea and tick infestations it may be necessary to replace the collar more frequently; however, do not replace the collar more frequently than every 5 months. Wetting will not impair the collar's effectiveness or the pet's protection. If the dog goes swimming or is out in the rain it is not necessary to remove the collar. The (brand name) (collar) may be worn with a regular collar. It is recommended that the pet's bedding or sleeping quarters be treated for flea and tick control with a product registered for this use such as (brand name).

STORAGE AND 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 for disposal instructions. Never place unused product down any indoor or outdoor drain.

For more information (or in case of emergency) call ~~(our)(flea and tick)(experts)(at)~~
1-800-275-1414 ~~(weekdays, 9am-5pm E.S.T.)~~

OPTIONAL/ALTERNATE LABEL TEXT

~~(Starts Killing) (Starts to Kill) (Kills) (&) (and) (Repelling) (Repel) (Repels) (Fleas)~~
~~(&) (and) (Ticks) (through Contact) for up to (5) (7) (seven) Months~~
~~(Starts Killing) (Starts to Kill) (&) (and) (Repel) (Repelling) (Fleas) (&) (and) (Ticks) on~~
~~contact for up to (5) (7) (seven) months~~
~~(5) (7) Month(s) Protection~~
~~Starts Working (on) (with) Contact~~
~~With Rabon®*~~

*Rabon® is the Hartz trademark for Tetrachlorvinphos

~~Kills (&) (and) (Repels) Up to (5) (7) Months~~
~~Kills (&) (and) (Repels) Ticks~~
~~Kills (&) (and) (Repels) Fleas~~
~~Kills (&) (and) (Repels) fleas and ticks~~
~~Kills (&) (and) (Repels) fleas and ticks (for) up to (5) (7) (seven) months~~
~~(Long Term) (7-Month) (Continuous) Protection (against fleas and ticks)~~
~~Kills fleas that may cause flea allergy dermatitis (and) (or) flea bite anemia.~~
~~Kills fleas that may transit tapeworm.~~
~~(Controls) (Kills) (fleas) (and) (&) (ticks) round-the-clock for (up to) (7) (seven) months~~

The active ingredient will work its way from the surface of the collar onto your pet's coat providing continuous protection against fleas and ticks

Rabon® is a registered trademark for Tetrachlorvinphos

NON-PESTICIDE RELATED CLAIMS AND OTHER OPTIONAL TEXT

For Dogs

For Puppies

For Dogs (&) (and) Puppies

With deodorant

(Clean) (Fresh) (deodorant) scent

Powerful Results When You Need (it)(them)

EASY ACTIVATION - To activate collar, hold at each end ... STRETCH ... and it's ready (to work) (to kill fleas & ticks) (for your dog to wear)

The Hartz UltraGuard™ Reflecting Flea & Tick Collar For ((Small) (Large) Dogs)

9 (Puppies) provides an added dimension of nighttime safety for you and your pet. The collar will reflect when light shines directly on the reflecting strip.

Water resistant

Fits up to (range from 15" to 26") necks

For (dogs) (and) (&) (puppies) with necks up to (range from 15" to 26")

Reflects Direct Light up to (200 ft.) (250 ft.) (300 ft.) (400 ft.) (450 ft.) (500 ft.) (550 ft.) (600 ft.)

White Collar with Reflecting Technology

White Collar with Reflective Technology

Visible (in) (to) headlights

17 The Hartz® (brand name) provides an added dimension of nighttime safety for you and your pet. The collar will reflect (up to 300 feet) when light shines directly (on) (onto) the reflective strip.

18 ~~Reflects direct light up to 300 feet (away) for an added dimension of nighttime safety.~~

Important: Consumer information and pet I.D. tag offer printed on inside of package.

Hartz® (brand name) products are designed to complement each other in an integrated program for flea (and) (&) tick management. To assure proper treatment, we recommend use of only Hartz® (brand name) products.

To learn more about treating current infestations and preventing future outbreaks please visit our website (www.hartz.com)(www.hartzultraguard.com)

To learn more visit (www.hartz.com)(www.hartzultraguard.com)

(PLEASE) VISIT OUR WEBSITE (AT) (www.hartz.com)(www.hartzultraguard.com)

Hartz recommends that you visit your veterinarian twice a year.

Be sure to read full directions and precautions on the label of every product you use.

Remember to always read each product label and follow the directions carefully.

Hartz® and other trademarks are trademarks of The Hartz Mountain Corporation