



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

OFFICE OF
PESTICIDES AND TOXIC
SUBSTANCES

APR 23 1991

Ms. Pat Bieler
The Hartz Mountain Corporation
700 Frank E. Rodgers Blvd. So.
Harrison, NJ 07029

Subject: Pump Formulation, Revised Labels
MRID No.'s 416573-02 through 06
Hartz 2 in 1 Flea & Tick Killer For Dogs/with Allethrin
EPA Registration No.2596-97
Hartz 2 in 1 Flea & Tick Killer For Cats/with Allethrin
EPA Registration No.2596-98
Submission: September 18, 1990

Dear Ms. Bieler:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments listed below. Five copies of the finished labeling must be submitted prior to releasing the product for shipment.

The data referred to above have been reviewed acceptable. They support use of the signal word CAUTION. Based on the acute dermal and eye irritation test results, the following label changes are appropriate for the precautionary text:

- (1) Revise the Precautionary Statements to read as follows:
"Harmful if absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling.

Do not use near birds, fish or foodstuffs. Do not spray...."

Statements of Practical Treatment should be added to the label. They must be set apart from other precautionary statements and the heading "Practical Treatment" should precede them. They should read as follows:

"If in eyes: Flush with plenty of water. Call a physician if irritation persists.
If on skin: Wash with plenty of soap and water. Get medical attention."

(2) Revise the second sentence of the Storage and Disposal statement to read as follows:

"Securely wrap original container in several layers of newspaper and discard in trash."

(3) Delete allyl homolog of Cinerin 1 from the ingredient statement.

It is understood that an inhalation study is underway and will be reported when complete. There may be further revisions of label text needed at that point. A copy of the review is enclosed for your reference. These formula statements dated September 18, 1990 are acceptable and replace earlier formulas approved under the respective registrations.

Sincerely,



Richard F. Mountfort
Product Manager 10
Insecticide & Rodenticide Branch
Registration Division (H7505C)

**REPELS FLIES, GNATS, AND MOSQUITOES
KILLS FLEAS, LICE, AND TICKS**

PRECAUTIONARY STATEMENTS
Hazards to Humans and Domestic Animals

CAUTION: Do not use near kids, kids, or livestock. Do not spray in open or flame of fire. Do not use on puppies under 4 weeks old. Wash hands thoroughly after use.

• Physical or chemical hazards
Do not use or store near heat or open flame.

DIRECTIONS FOR USE

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

1. Hold bottle upright 6 inches from pet. Direct spray toward pet and spray entire coat, pressing dispenser with quick, short strokes. Move bottle to get even coverage of coat (with line of hair are moist).
2. Apply lightly and rub into animal's coat. For long haired dogs, ruffle hair for spray to reach skin.
3. After 10 minutes, dry dog with towel.
4. Comb and brush coat.
5. Repeat once a week for fresh, glossy coat. Use on bedding and other areas as needed.
6. Kills fleas in 8 to 10 minutes. Ticks are tough — spray directly.

Storage and Disposal
Do not reuse empty container. Wrap container and put in trash collection.

ACTIVE INGREDIENTS:	
d-trans Allethrin (Allyl homolog of Cinerin I)	0.05%
3-phenoxybenzyl-(IRS, IRS; IRS, JSR)-2, 2-dimethyl-3-(2-methylprop-1-enyl) cyclopropanecarboxylate	0.05%
N-Octyl bicycloheptene dicarboximide	0.19%

INERT INGREDIENTS:	99.71%
EPA Reg. No. 2596-97	100.00%
EPA Est. 2594-01-1	

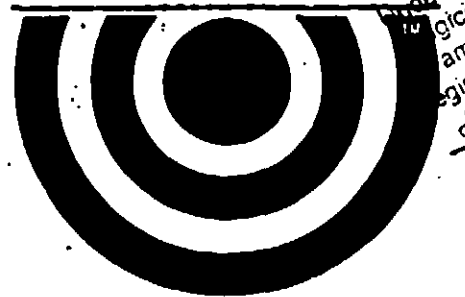


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Made and printed
in U.S.A.
RMA:

HARTZ

**2 in 1
FLEA & TICK
KILLER**
FOR DOGS

FINE MIST SPRAY



KEEP OUT OF REACH OF CHILDREN
CAUTION: See back panel for additional precautionary statements

8 fl oz 236 ml
85299 8

ACCEPTED
COMMENTS
APR 23
2596-

BEST AVAILABLE COPY