

2596-125

10/8/2008

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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

October 8, 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**Subject: Amended Labeling, Incorporation of Previously Rescinded Notification Language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® Flea & Tick Pump for Dogs II, EPA Reg. No. 2596-125
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):

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

1. Replace the 3rd sentence in paragraph 1 with: "Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet."
2. Replace the 1st sentence in paragraph 2 with "Do not use on puppies ..." with: "Do not apply to pets (puppies) less than six (6) weeks old."

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.

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"
002596-00125 D397473

Hartz® 2 in 1® Flea & Tick Pump for Dogs II

Alternate Brand Names

- Hartz® UltraGuard™ Flea & Tick Spray for Dogs
- Hartz® Advanced Care™ 2 in 1® Flea & Tick Dog Spray
- Hartz® 2 in 1® Flea & Tick Dog Spray

ACTIVE INGREDIENT:	(BY WEIGHT) (NOM.)
Tetrachlorvinphos [CAS#22248-79-9]	1.08%
OTHER INGREDIENTS	98.92%
(TOTAL	100.00%)

Note: CAS # may or may not be shown on label

KEEP OUT OF REACH OF CHILDREN

CAUTION: See back panel for additional precautionary statements.
 See (back) (side) panel(s) for additional precautionary statements.

NET CONTENT ____ fl. oz. (____ ml)

EPA Reg. No. 2596-125
 EPA Est. No. 2596-NJ-1

Made (in the USA) by The Hartz Mountain Corporation, 400 Plaza Drive, Secaucus, NJ 07094

ACCEPTED
 With COMMENTS
 In EPA Letter Dated:
October 8, 2008
 Under the Federal Insecticide, Fungicide
 and Rodenticide Act, As amended, for the
 pesticide Registered under EPA Reg. No:
2596-125

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

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash hands and exposed skin thoroughly with soap and water after handling.

Do not use on puppies under 6 weeks old. Consult a veterinarian before using this product on debilitated, aged, or medicated animals. Sensitivity 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. Do not use near birds, fish or foodstuffs. If used on pregnant or nursing dogs, do not retreat until the puppies are at least 6 weeks old. Do not use this product 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 after use.

FIRST AID

Contains an organophosphate that inhibits cholinesterase.

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.

If swallowed •Call 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 the poison control center or doctor. •Do not give anything by mouth to an unconscious person.

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.

SHAKE WELL BEFORE USE

- ~~1. Hold bottle upright 6 inches from pet. Direct spray towards pet and spray entire coat, pressing dispenser with quick short strokes. Move bottle to get even coverage of coat (until tips of hair are moist).~~
- ~~2. Apply lightly and rub into animal's coat. For longhaired dogs, ruffle hair for spray to reach skin.~~
- ~~3. Recommended dosage: Spray 25-30 strokes for a small dog (e.g. Terrier). Spray 30-40 strokes for a medium dog (e.g. Spaniel). Spray 40-70 strokes for a large dog (e.g. Labrador). More spray may be needed for longhaired dogs.~~
- ~~4. Ticks are tough—spray directly.~~
- ~~5. After 10 minutes, dry dog with towel.~~
- ~~6. Comb and brush coat.~~
- ~~7. Repeat once a week. Use on bedding and other areas as needed.~~

1. Hold bottle upright about 6 inches from pet.

2. Spray lightly until the tips of the pet's hair are moist. Keep spray out of pet's eyes.

3. Rub spray into animal's coat. For longhaired dogs, ruffle fur to allow the spray to reach skin.

4. After 10 minutes, dry dog with towel.

5. Comb and brush coat.

6. Repeat once a week.

7. If you see a tick, spray it directly.

8. Use on bedding and other areas as needed.

Recommended dosage: Spray 25-30 strokes for a small dog (e.g. Terrier). Spray 30-40 strokes for a medium dog (e.g. Spaniel). Spray 40-70 strokes for a large dog (e.g. Labrador). More spray may be needed for longhaired dogs.

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.

OPTIONAL/ALTERNATE LABEL TEXT

Kills the Deer tick which may carry Lyme disease

Kills and repels fleas and ticks

Fast acting

~~Kills (Fleas) (&) (and) (Ticks)~~

Kills fleas within 10 minutes

~~Hartz® 2 in 1®, Flea & Tick Pump for Dogs II (actually) prevents fleas and ticks from living on your pet. This spray may also be used to kill any fleas and ticks already on your dog. Once sprayed, fleas will be killed within 5 to 10 minutes.~~

~~Kills (Fleas) (&) (and) (Ticks) (through contact)~~

~~(Immediately) starts to kill (Fleas) (&) (and) (Ticks) (through contact)~~

~~Kills fleas which may cause (flea bite anemia) (flea allergy dermatitis)~~

~~Kills fleas that may transmit tapeworm~~

~~Kills (and repels) (fleas) (ticks)~~

~~(Starts) Killing (through) contact~~

~~Kills (through) contact~~

~~Flea and tick control~~

~~Important Information: The ABC's of Flea & Tick Management~~

~~Control Pet Care System products are designed to work together in a complete insecticidal system. For elimination of fleas and ticks, it is necessary to treat not only the pet but also its surrounding environment. Use Control Pet Care System products and follow these simple ABC's to get rid of fleas and ticks on your pet and around your home.~~

~~STEP A TREAT YOUR PET (with one of the Control Pet Care System on animal products such as Conditioning Shampoo, Dip, Powder or Spray) to kill fleas and ticks living on your pet.~~

~~STEP B PROTECT YOUR PET (with a Control Pet Care System Repellent or Ultimate Flea Collar with Rabon® and viGren®) to fleas and ticks fro reinfesting your pet. The Control Pet Care System Ultimate Flea Collar will also prevent flea eggs from hatchin~~

~~STEP C TREAT YOUR HOME both indoors and outdoors with Control Pet Care System Home Flea & Tick Killer or Fogger with viGren®, and Control Pet Care System Yard and Kennel Spray to protect your entire home and guard against reinfestation. The Control Pet Care System Flea Trap will also serve to help break the flea life cycle by killing fleas in hard to reach areas in your home.~~

~~The Stress-Free System for Eliminating Fleas & Ticks~~

~~ON ANIMAL PROTECTION~~

Relief for your

Use ~~Relieve Pet Protection Conditioning Shampoo, Dip, Spray, or Powder to kill fleas and ticks living on your pet.~~

REPELLENT

Keep flea and ticks off your pet

~~Prevent any more fleas and ticks from coming onto your pet by spraying your pet with Relieve System Repellent for Dogs.~~

NON-PESTICIDE RELATED CLAIMS AND OTHER OPTIONAL TEXT

Deodorizing

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

~~For more information, call our experts at xxx-xxx-xxxx~~

~~Shake well before use~~

~~With Rabon®~~

~~Rabon® is a trademark for tetrachlorvinphos.~~

~~Rabon® is a registered trademark for tetrachlorvinphos.~~

~~vIGRen® is a registered trademark of Wellmark Intl.~~

~~For full precautions and directions for use, peel (back) here.~~

MONEY BACK GUARANTEE

~~Be sure to read full directions and precautions the label of each product you use. For more information or help at any step, call our flea and tick experts at 1-800-275-1414, Monday 9 am - 5 pm E.S.T.~~

~~{Made (by Hartz®) in (the) U.S.A. (by)}~~

~~©The Hartz Mountain Corporation~~

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

~~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.~~

~~As with all flea and tick products, they are most effective when used as part of a total program aimed at reducing fleas and ticks in the (dog's) (cat's) (pet's) environment.~~

~~A single female flea can lay [an average of] 25 eggs per day [on average]~~

~~Complete your preventative program with products that kill both adult and pre-adult fleas.~~

~~(Complete your defense against fleas with) (two) ingredients targeted at (killing fleas) (breaking the life cycle)~~

~~Be sure to treat the animal's bedding and surroundings with product registered for these uses, such as Hartz (brand name) line (products)~~

~~Visit (our website)~~