



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**Subject: Amended Labeling, Incorporation of Previously Rescinded Notification Language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 Cats II, EPA Reg. No. 2596-126
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 kittens ..." with: "Do not apply to pets (kittens) less than twelve (12) 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.

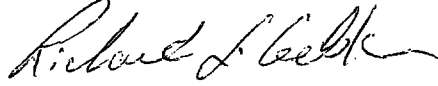
Offer for recycling, if available. **If partly filled:** Call your local solid waste agency [or toll free number or website which meets the criteria in paragraph II.E., P.R. Notice 2007-1] for disposal instructions. Never place unused product down any indoor or outdoor drain.

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"
002596-00126 D397472

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

Alternate Brand Names

Hartz® UltraGuard™ Flea & Tick Spray for Cats
Hartz® Advanced Care™ 2 in 1® Flea & Tick Cat Spray
Hartz® 2 in 1® Flea & Tick Cat 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 (ingredient) (and) additional precautionary statements.
[Ingredient statement on the back of 8 fl oz package only]

NET CONTENT _____ fl. oz. (_____ ml)

EPA Reg. No. 2596-126

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:
2596-126

READ ENTIRE LABEL BEFORE EACH USE

GENERAL PRECAUTIONS AND RESTRICTIONS:

USE ONLY ON CATS

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 kittens under 12 weeks old. Consult a veterinarian before using this product on debilitated, aged, medicated, pregnant or nursing 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. 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 replaced immediately 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.

**APPLICATION INSTRUCTIONS:
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 cats, ruffle hair for spray to reach skin.~~
- ~~3. Recommended dosage: Spray 15-25 strokes for a small cat. Spray 25-35 strokes for a large cat. More spray may be needed for longhaired cats.~~
- ~~4. Ticks are tough spray directly.~~
- ~~5. After 10 minutes, dry cat 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 cats, ruffle fur to allow the spray to reach skin.
- 4. After 10 minutes, dry cat 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 15-25 strokes for a small cat. Spray 25-35 strokes for a large cat. More spray may be needed for longhaired cats.

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 Fleas

Kills Ticks

Kills the Deer tick which may carry Lyme disease

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

Kills flea within 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~~

~~Hartz® 2 in 1 Flea & Tick Pump for Cats II (this product) (alternate brand name) (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 cat. Once sprayed, fleas will be killed within 5 to 10 minutes. In addition, this product leaves you pet's coat soft, glossy, and manageable.~~

~~[For more information (or help at any step,) call our flea and tick experts at 1-800-275-1414 (weekdays)(Monday through Friday), 9am-5pm (E.S.T.) (Eastern Time).]~~

IMPORTANT INFORMATION:

The ABC's of Flea & Tick Management

~~(Control Pet Care System) (alternate brand name) 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) (alternate brand name) 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) (alternate brand name) 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) (alternate brand name) Repellent or Ultimate Flea Collar with Raben to keep fleas and ticks from re-infesting your pet.~~

MASTER LABEL BASED ON 1/16/03 EPA STAMPED APPROVED LABEL

~~STEP C TREAT YOUR HOME both indoors and outdoors with (Control Pet Care System) (alternate brand name) Home (Flea & Tick) (Spray) Killer or Fogger with vIGRen®, and (Control Pet Care System) (alternate brand name) Yard and Kennel Spray to protect your entire home and guard against reinfestation. The (Control Pet Care System) (alternate brand name) Flea Trap will also serve to help break the flea life cycle by killing fleas in hard to reach areas in your home. Be sure to read full directions and precautions on the label of each product you use.~~

~~The Stress-Free System For Controlling Fleas & Ticks~~

~~On Animal Protection~~

Relief for your pet

~~Use (Releve Pet Protection System) (alternate brand name) Conditioning Shampoo, Dip, Spray, or Powder to kill fleas and ticks living on your pet.~~

~~Repellent~~

Keep fleas and ticks off your pet

~~Prevent any more fleas and ticks from coming onto your pet by spraying your pet with (Releve Pet Protection System Repellent for Dogs or Repellent for Cats) (alternate brand name).~~

~~Continuous Protection~~

Long term protection for your pet

~~Keep fleas and ticks from reinfesting your pet with (Releve Pet Protection System 7-Month Flea & Flea Egg Collar with vIGRen®) (alternate brand name), which will prevent flea eggs from hatching and Rabon® to kill adult fleas and ticks.~~

~~Home & Yard~~

Protect your home and yard

~~Kill fleas and ticks around your home with (Releve Pet Protection System) (alternate brand name) Carpet Powder, Yard and Kennel Spray, Home Flea & Tick Killer and Home Fogger.~~

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

NON-PESTICIDE RELATED CLAIMS AND OTHER OPTIONAL TEXT:

Fast acting

Deodorizing

Fine Mist Spray

With Rabon® (Rabon® is a trademark for Tetrachlorvinphos)

Rabon® is a registered trademark for Tetrachlorvinphos.

vIGRen® is a registered trademark of Wellmark Intl.

[Made (by Hartz®) in (the) U.S.A. (by)]

©The Hartz Mountain Corporation

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

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MASTER LABEL BASED ON 1/16/03 EPA STAMPED APPROVED LABEL

Leaves coat soft and manageable

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

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

U.S. Patent No. 5,595,749

Shake well before use

For full precautions and directions for use, peel back here

Unconditional Money back guarantee

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) (www.hartz.com) (www.hartzultraguard.com)