OCT 1 1 2005

Ms. Margaret W. Dickson Hartz Mountain Corporation 400 Plaza Drive Secaucus, New Jersey 07094-3688

Subject: Revised Label

Hartz Sumithrin Carpet Powder EPA File Number: 2596-132

Application Dated: August 26, 2005

Dear Ms. Dickson:

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:

On page one of your product labeling add the "statement"
 FOR INSECTICIDAL USE ONLY.

- 2. On page two under the sub-heading, "keep children and pets out of room. Revise the statement to read: leave on for two hours, then vacuum. To read: leave on for two hours, thoroughly vacuum to remove all insecticide product. In addition, add the following statement: 6. Do not reapply this product within 30 days.
- 3. On page three revise the sub-heading, OPTIONAL/ALTERNATE LABEL TEXT TO read; ALTERNATE LABEL TEXT. This is required language text.

A stamped copy of the label is enclosed.

Sincerely,

Richard J. Gebken Product Manager 10 Insecticide Branch

Registration Division (7505c)

8/25/2005 Page 1 of 3

HARTZ® SUMITHRIN CARPET POWDER

[Alternate Brand Names
Hartz[®] Advanced Care™ 2 in 1[®] Potpourri Carpet Powder]

ACCEPTED
with COMMENTS
In EPA Letter Dated
OCT | | 2005

Finder the Federal Insecticide, Freghtle, and Redemicide Act, in secondard, for the posicide Viginized under EPA Reg. No.

ACTIVE INGREDIENTS:	(By Weight)
Sumithrin	0.50%
N-octyl bicycloheptene Dicarboximide	1.18%
OTHER INGREDIENTS	98.32%
(TOTAL	100.00%)

KEEP OUT OF REACH OF CHILDREN

CAUTION

See back panel for (additional) precautionary statements.

(Net Wt:) 20 oz. (1 lb. 4 oz.) 567 g

EPA Reg. No. 2596-132 EPA Est. No.

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

©The Hartz Mountain Corporation Secaucus, NJ 07094 (U.S.A.) (and St. Thomas, Ontario N5P 3W7 Canada)

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS— Causes moderate eye irritation. Avoid contact with eyes or clothing. Harmful if inhaled. Avoid breathing powder. Remove and wash contaminated clothing before reuse. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet.

	FIRST AID
Have label with you when obtaining 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, doctor, or 1-800-222-1222 immediately for treatment advice.
If inhaled:	 Move person to fresh air If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth to mouth if possible. Call a poison control center, doctor, or 1-800-222-1222 immediately for treatment advice.

DIRECTIONS FOR USE

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

READ ENTIRE LABEL BEFORE EACH USE

Keep children and pets out of room.

Do not use on wet spots.

- 1. Press out plastic seal in top
- 2. Turn top to directed opening
- 3. Shake powder lightly over entire carpet or area to be treated. Product is to be applied at a rate of [16 oz. covering a 9' by 12' (108 square foot) area of carpet] [20 oz. covering a 9' by 15' (135 square foot) area of carpet].
- 4. Leave on for two hours, then vacuum.
- 5. Remove vacuum bag after use and discard in trash.

STORAGE AND DISPOSAL:

Storage: Store in a cool, dry place. Disposal: If empty: Do not reuse this container. Place in trash or offer for recycling if available. If partly filled: Call your solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

[For more information (about flea and tick problems and how to solve them) (or in an emergency) call (our flea and tick experts at) 1-800-275-1414 weekdays, 9am-5pm (E.S.T.) (Eastern Time)]

8/25/2005 Page 3 of 3

OPTIONAL/ALTERNATE LABEL TEXT

Kills (fleas) (and) (ticks) in (your) (the) (carpet) (or) (upholstery) (or) (car)

NON-PESTICIDE RELATED CLAIMS AND OTHER OPTIONAL TEXT

Use with a vacuum cleaner Can be used for (all) (carpets) (and) (upholstery) (Contains) (clean) (Potpourri) (fresh) (fragrance)(scent)

Hartz[®] Every Pet's Best FriendTM
VISIT OUR WEBSITE
www.hartz.com
(Money back guarantee) (by Hartz[®])
Hartz[®] and other trademarks are trademarks of The Hartz Mountain Corporation
New Note: for new introductions to market; to be maintained only for six months