

2596-140

9/3/2003

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United States Environmental Protection Agency

Ms. Carol Oddi, Regulatory Specialist  
Hartz Mountain Corp.  
400 Plaza Drive  
Secaucus, New Jersey 07094

SEP 3 2003

Subject: Amendment in response to PR Notices 2001-1 and 2001-6  
Product Name: Hartz Health Care 3 in 1 Dog Spray  
EPA Registration Number: 2596-140  
Submission Dated: June 24, 2003

Dear Ms. Oddi,

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

1. Within the First Aid Statement, after the "IF SWALLOWED" subheader, move the text "Contains an organophosphate that inhibits cholinesterase." to directly below the heading "FIRST AID" this is outlined in PR Notice 2001-1 page 2, and a visual layout is presented on page 6 of the PR Notice.

If you have any questions please contact Richard J. Gebken, at (703) 305-6701.

Sincerely,



George LaRocca  
Product Manager 13  
Insecticide Branch  
Registration Division (7505C)

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CONCURRENCES								
SYMBOL ▶	H7505C							
SURNAME ▶	RGEBKEN							
DATE ▶	Sep 3, 2003							

**FRONT PANEL**

**HARTZ RABON SPRAY WITH METHOPRENE PUMP FORMULATION**

**Alternate Name: Hartz® HealthCare™ 3 in 1 Dog Spray**

<b>ACTIVE INGREDIENTS:</b>	<b>BY WEIGHT [NORM.]</b>
Tetrachlorvinphos (CAS # 22248-79-9).....	1.08%
[S]-Methoprene: (CAS# 65733-16-6).....	0.07%
<b>INERT INGREDIENTS.....</b>	<b>9.8.85%</b>

**KEEP OUT OF REACH OF CHILDREN**

**CAUTION**

See back panel for additional precautionary statements.

Net Wt. [Ranges from 6 oz, to 64 oz.]

**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.

**FIRST AID**

**IF SWALLOWED:** Contains an organophosphate that inhibits cholinesterase. 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 of doctor, or going for treatment.

**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-

ACCEPTED  
with COMMENTS  
In EPA Letter Dated  
SEP 3 2003  
Under the Federal Insecticide,  
Fungicide, and Rodenticide Act,  
as amended, for the pesticide  
registered under EPA Reg. No.  
2596-140

PAM may be effective as an adjunct to atropine. Call a Poison Control Center for further information.

**PRECAUTIONARY STATEMENTS**

**HAZARDS TO HUMANS – CAUTION:** Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling. Prolonged or frequently repeated skin contact may cause allergic reaction in some individuals. Do not use on puppies or kittens under 12 weeks. Do not spray in eyes

To prevent harm to you or your pet, read entire label before use.

**HAZARDS TO ANIMALS –** Consult 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.

**PHYSICAL OR CHEMICAL HAZARDS –** Contents under pressure. Do not use or store near heat or open flame. Do not puncture or incinerate container. Exposure to temperatures above 103°F may cause bursting.

**ENVIRONMENTAL HAZARDS-** This product is toxic to aquatic invertebrates. Using it in a manner other than that described by this label could result in harm to aquatic invertebrates.

**BACK PANEL**

**HARTZ RABON SPRAY WITH METHOPRENE PUMP FORMULATION**

[Hartz Rabon Spray With Methoprene contains both an insecticide to kill and repel adult fleas and ticks and an insect growth regulator (IGR), to kill flea eggs before they hatch, an effective insecticide which kills and repels adult fleas and ticks, and a long lasting insect growth regulatory which prevents flea eggs from hatching and larvae from maturing into adults.] Adult fleas spend virtually all of their time on your pet, but they product vast numbers of eggs, which drop off the pet and develop in the environment. [Hartz Rabon Spray with Methoprene kills flea eggs and larvae before they drop off your pet.] Once fleas are apparent on your pet, there is already an infestation of their pre-adult stages in your home. Normal insecticides will not kill the flea eggs. But Hartz Rabon Spray With Methoprene is designed to kill both the adult flea and its eggs and larvae, thereby breaking the flea life cycle. The spray will also break the tick life cycle by killing adult ticks, including the Deer Tick, which may carry Lyme Disease, and the Rocky Mountain Tick, which may carry Rocky Mountain Spotted Fever.

**DIRECTIONS FOR USE:**

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

**READ ENTIRE LABEL BEFORE EACH USE**

**USE ONLY ON DOGS**

**USE ONLY ON CATS**

**SHAKE WELL BEFORE USE:** To kill and repel fleas, ticks and lice for 7 days for 1 week, thereby reducing incidence of itching and scratching and to kill flea eggs and prevent their hatching for over 1 month [28 days] [4 weeks], hold container upright 6-10 inches from the animal and spray lightly over the entire body, pressing the dispenser with quick short strokes. Move spray to get even coverage of coat until tips of hair are moist. Do not spray in eyes. Apply lightly and rub into coat. Ruffle hair for spray to reach skin. Once sprayed, fleas will be killed within 5 to 10 minutes. Ticks are tough – spray directly. In addition to controlling fleas and ticks, this product leaves your pet’s coat soft, glossy and manageable.

Under normal circumstances, to kill adult fleas and ticks, repeat spray once every few days until infestation is brought under control. For more prolonged flea and tick control, the animal’s bedding, quarters and surrounding area should also be sprayed lightly until damp to help prevent reinfestation.

**STORAGE AND DISPOSAL:**

**Storage:** Store at room temperature.

**Disposal:** 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-CLEAANUP) for disposal instructions. Never place unused product down any indoor or outdoor drain.

Unconditional Money-Back Guarantee. For more information about flea and tick problems and how to solve them, call 1-800-275-1414, weekdays, 9 am to 5 PM Eastern time.

**EPA Reg. No 2596-140**

**EPA Est. No. 2596-NJ-1**

Made for Hartz in U.S.A.

Made in the U.S.A. by

©The Hartz Mountain Corporation  
Secaucus, NJ 07094

VISIT OUR WEBSITE [www.hartz.com](http://www.hartz.com)

Unconditional Money-Back Guarantee. For more information about flea and tick problems and how to solve them call 1-800275-1414, weekdays, 9am to 5pm Eastern time.

Rabon is a registered trademark for Tetrachlorvinphos  
viGRen® is a registered trademark of Wellmark Intl.

**OPTIONAL COPY #1**

**IMPORTANT INFORMATION:**

**The ABC’s of Flea & Tick Management**

**A – Treat Your Pet**

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 on-animal products such as Conditioning Shampoo, Dip, Powder or Spray. Use a Control product containing viGRen®, an Insect Growth Regulatory [IGR] to also stop hatching flea eggs from developing into biting adults.

**STEP B – PROTECT YOUR PET** with a Control repellent or flea and tick collar to keep fleas and ticks from reinfesting your pet. The Control Pet Care System Ultimate Flea Collar™ will also prevent flea eggs from hatching.

**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. Be sure to read full directions and precautions the label of each product you use.

**OPTIONAL COPY #2**

**THE STRESS-FREE SYSTEM FOR CONTROLLING FLEAS & TICKS**

**ON ANIMAL PROTECTION**

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*Relief for your*

Use Releve Pet Protection System 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.

**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®, 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 our home with Releve Pet Protection System 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.

Rabon®, is a registered trademark for Tetrachlorvinphos  
vIGRen®, is a registered trademark of Wellmark Intl.

**[OPTIONAL WORDING]**

(for dogs [cats]) (for puppies [kittens]) (fine mist spray) (flea and tick spray [killer])

(kills [adult] fleas and ticks for [7 days] [1 week]) (kills fleas, ticks and lice)

(prevents reinfestation and flea build-up for 1 month)

(kills insects which reduces the incidence of itching and scratching)

(with Rabon) (with vIGRen® [insect growth regulator])

(prevents [flea] eggs [ova] [ovum] from hatching [for over 1 month [28 days] [4 weeks]])

(kills flea eggs [and prevents their hatching] for [over 1 month [28 days] [4 weeks]])

(kills flea eggs [and larvae]) (kills hatching eggs [ova] [ovum]) (eggs stop [formula])

(repellent) (repels fleas and ticks) (fast acting) (water-based formula)

(actually prevents fleas and ticks from living on your pet)

(contains an insect growth regulator)

(contains an adulticide)

(stops the flea and tick life cycle) (kills all stages of the flea [life cycle])

(waterproof) (not affected [unaffected] by water) (works even after bathing or swimming!) (works even after a swim)

(contains a conditioner) (conditioning formula) (with deodorant) (fresh deodorant [deodorizing] formula) (ovicidal activity [active])

(Kills the Deer Tick, which may carry Lyme Disease) (Kills the Rocky Mountain Wood Tick, which may carry Rocky Mountain Spotted Fever)

(Direct Treatment) (satisfaction guaranteed) (money back guarantee)