

2596-140

10/9/2008

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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

October 9, 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**Subject: Amended Labeling, Incorporation of Previously Rescinded Notification Language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® Rabon® Spray with Methoprene Pump Formulation, EPA Reg. No. 2596-140
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 4th 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 6th sentence with "Do not use on puppies ..." with: "Do not use on (puppies) (kittens) (puppies or 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 20007-1] for disposal instructions. Never place unused product down any indoor or outdoor drain.

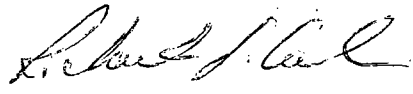
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Should you wish to add/retain a reference to the company's website on your label, please be aware that the website becomes labeling under FIFRA and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded 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"
002596-00140 D397478

Hartz® Rabon® Spray with Methoprene Pump Formulation

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EPA Reg. No.: 2596-140

MASTER LABEL BASED ON 12/19/05 EPA STAMPED APPROVED LABEL

Hartz® Rabon® Spray with Methoprene Pump Formulation

Alternate Brand Names

- Hartz® UltraGuard Plus™ Flea & Tick Spray for Dogs
- Hartz® UltraGuard Plus™ Flea & Tick Spray for Cats
- Hartz® Advanced Care™ 3 in 1 Dog Spray
- Hartz® Advanced Care™ 3 in 1 Cat Spray
- Hartz® 3 in 1 Dog Spray
- Hartz® 3 in 1 Cat Spray
- Hartz® InControl Flea & Tick Dog Spray
- Hartz® InControl Flea & Tick Cat Spray

ACCEPTED
With COMMENTS
In EPA Letter Dated:
October 9, 2008
Under the Federal Insecticide, Fungicide
and Rodenticide Act, As amended, for the
pesticide Registered under EPA Reg. No:
2596-140

- ~~Pet Principles by Hartz® Flea & Tick Spray for Cats~~
- ~~InControl by Hartz® Flea & Tick Spray for Cats~~
- ~~InControl by Hartz® Flea & Tick Spray for Dogs~~
- ~~Hartz® Advanced Care™ 3 in 1 Dog & Cat Spray~~
- Hartz® Rabon® Spray with Methoprene Pump Formulation

ACTIVE INGREDIENTS:	(BY WEIGHT)
Tetrachlorvinphos [CAS# 22248-79-9]	1.08%
[S]-Methoprene [CAS# 65733-16-6]	0.07%
OTHER INGREDIENTS	98.85%
TOTAL	100.00%

Note: CAS numbers may or may not be included in ingredient statement

KEEP OUT OF REACH OF CHILDREN

CAUTION

See back panel for precautionary and first aid statements.

See (back) (side) panel(s) for (ingredient) (and) additional precautionary statements.

[Ingredient statement on the back of 8 fl oz bottle only]

NET CONTENT: _____ fl. oz. (_____ ml)

EPA Reg. No. 2596-140

EPA Est. 2596-NJ-1

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

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MASTER LABEL BASED ON 12/19/05 EPA STAMPED APPROVED LABEL

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

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. Prolonged or frequently repeated skin contact may cause allergic reaction in some individuals. Do not use on (puppies) (kittens) (puppies or kittens) under 12 weeks of age. Do not spray in eyes. To prevent harm to you or your pet, read entire label before use. Consult a veterinarian before using this product on debilitated, aged, pregnant, nursing, 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.

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.

FIRST AID

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) a Poison Control Center for further information.

(Remember to always read each product label and follow directions carefully.)

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MASTER LABEL BASED ON 12/19/05 EPA STAMPED APPROVED LABEL

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) (CATS) (DOGS OR CATS)

~~SHAKE WELL BEFORE USE: To kill and repel fleas, ticks and lice for (7 days) (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 to 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.~~

SHAKE WELL BEFORE USE:

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) (cats), 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.

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.

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OPTIONAL/ALTERNATE LABEL TEXT

Flea and tick (spray) (killer)
Kills (adult) fleas and ticks for [(7) (seven) days] [(1) (one) week]
Kills fleas, ticks, and lice
Prevents reinfestation and flea build-up for 1 (one) month
Kills insects, which reduces the incidence of itching and scratching
Contains an insect growth regulator
Prevents (flea) eggs (ova) (ovum) from hatching for ~~over~~ [(1) (one) month] (28 days) (4 weeks)
Kills flea eggs (and larvae) for ~~over~~ (1) (one) month (28 days) (4 weeks)
Kills hatching eggs (ova) (ovum)
~~Ovicidal activity (active)~~
~~Eggs stop (formula)~~
Repellent
Repels fleas and ticks
Kills and repels (adult) fleas and ticks
Fast-acting
Kills fleas in 10 minutes
Actually prevents fleas and ticks from living on your pet
~~Contains an adulticide~~
~~Breaks the flea and tick life cycle~~
~~Kills all stages of the flea (life cycle)~~
~~Kills (Fleas) (&) (and) (Ticks) (through contact)~~
~~Kills (Fleas) (&) (and) (Ticks)~~
~~(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)~~
~~(Plus) kills (keeps killing) pre-adult flea stages (too)~~
~~Breaks the flea life cycle~~
~~(Plus) Kills (fleas) (and) (ticks) and pre-adult fleas (before they grow into biting adults)~~
~~(Plus) Kills fleas and ticks and (continues to protect against) (prevents) pre-adult fleas from (changing) (growing) (developing) into biting adults~~
~~(Plus) Prevents infestation by halting the flea reproductive cycle~~
~~(Plus) halts the flea life cycle by killing flea eggs (and flea larvae)~~
One step to treat and prevent
One step to treat existing problem and prevent future infestations
~~(Plus) Provides protection against future infestations~~
Treats & (and) Prevents in one step
~~(Plus) Prevents Fleas Eggs (and flea larvae) from hatching for (1 month) (28 days) (4 weeks)~~
~~(Plus) Kills flea eggs (and flea larvae) helping to prevent re-infestations~~
~~(Plus) Kills (flea eggs) (and flea larvae) before they hatch~~
Helps prevent flea re-infestation for (1 month) (28 days) (4 weeks)
~~(Plus) Stops fleas from multiplying~~
~~(Plus) Protects against pre-adult fleas~~

Kills (3 stages) of (tick) (the tick) life cycle
(Plus) kills (adult ticks) (larvae) (and) (&) (nymphs)
Kills (pre-adult) ticks
Kills (and Prevents) (Flea Eggs) (and) (Flea Larvae) for (one month) (4 weeks) (28 days)
Kills and repels (fleas) (ticks) (flea eggs) (flea larvae) for (1 month) (28 days) (4 weeks)
Kills (fleas) (ticks) (flea eggs) (flea larvae) for (1 month) (28 days) (4 weeks)
(Starts) killing (through) contact
Kills (through) contact
Controls flea and tick infestations on dogs
Flea and tick control
(one product) kills (fleas) (ticks) plus flea eggs (flea larvae)
Flea egg and flea larvae treatment
Kills all stages of the flea life cycle
Controls (kills) fleas, ticks round-the-clock for up to (1 month) (28 days) (4 weeks)
Controls flea (population growth) (infestation)
Focused on breaking the flea life cycle
Controls flea infestation where it starts
Active ingredient (specifically) targeting flea eggs and flea larvae – stopping their ability to mature and infest your home
Help prevent flea re-infestation for (1 month) (28 days) (4 weeks)
X Day Protection

(This product) (alternate brand name) contains [(both) (an adulticide to kill adult fleas and ticks) and an insect growth regulator (IGR) to kill flea eggs before they hatch] [an insecticide which kills adult fleas and ticks and an insect growth regulator which prevents flea eggs and flea larvae from maturing into adults] (Adult fleas spend virtually all of their time on your pet, but they produce eggs which drop off the pet and develop in the environment) [once fleas are apparent on your pet, there can already be an infestation of their pre-adult stages in your home. (this product) (alternative brand name) is designed to kill both the adult flea and flea eggs and flea larvae, thereby breaking the flea life cycle]

~~(Hartz® Rabon® Spray with Methoprene) (this product) (product name) 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 insecticide which kills and repels adult fleas and ticks, and a long lasting insect growth regulator (IGR) 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 produce vast numbers of eggs, which drop off the pet and develop in the environment. [(Hartz® Rabon® Spray with Methoprene) (this product) (product name) 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) (this product) (product name) 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.~~

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IMPORTANT INFORMATION:

The ABC's of Flea & Tick Management

~~(Control Pet Care System) (this product) (product 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) (this product) (product 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) (this product) (product name) such as Conditioning Shampoo, Dip, Powder or Spray. Use a (Control) (this product) (product name) product containing vIGRen[®], an insect growth regulator (IGR) to also stop hatching flea eggs from developing into biting adults.~~

~~STEP B PROTECT YOUR PET with a (Control) (this product) (product name) repellent or flea and tick collar to keep fleas and ticks from reinfesting your pet. The (Control Pet Care System Ultimate Flea Collar) (this product) (product name) will also prevent flea eggs from hatching.~~

~~STEP C TREAT YOUR HOME both indoors and outdoors with (Control Pet Care System) (this product) (product name) Home Flea & Tick Killer or Fogger with vIGRen[®], and (Control Pet Care System) (this product) (product name) Yard and Kennel Spray to protect your entire home and guard against reinfestation. The (Control Pet Care System) (this product) (product name) Flea Trap will also serve to help break the flea life cycle by killings 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.~~

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OPTIONAL/ALTERNATE LABEL TEXT, continued

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

~~**On Animal Protection**~~

~~Relief for your pet~~

~~Use (Releve Pet Protection System) (product 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) (product 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® (product 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) (product 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.~~

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

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

NON-PESTICIDE RELATED CLAIMS AND OTHER OPTIONAL TEXT

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

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

~~Hartz® Every Pet's Best Friend™~~

~~Visit (our website) (www.hartz.com) (www.hartzultraguard.com) (www.hartzincontrol.com)~~

~~(Money back guarantee) (by Hartz®)~~

~~Hartz® and other trademarks are trademarks of the Hartz Mountain Corporation~~

~~For (dogs) (cats) (puppies) (kittens)~~

~~Fine mist spray~~

~~With Rabon®~~

~~With (vIGRen®) (insect growth regulator) (IGR)~~

~~Water-based formula~~

~~Contains a conditioner~~

~~Conditioning formula~~

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MASTER LABEL BASED ON 12/19/05 EPA STAMPED APPROVED LABEL

With deodorant.

Fresh deodorant (deodorizing) formula

Direct treatment

Patented formula

Made in the U.S.A. (by) ©The Hartz Mountain Corporation, Secaucus, NJ 07094 (U.S.A.)

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

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

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)