



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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

July 1, 2009

Ms. Nancy Huebl,
Senior Registration Specialist
Wellmark International
1501 East Woodfield Road, Suite 200 West
Schaumburg, IL 60173-5417

**Subject: Amending Label, Rebuttal to EPA Letter Dated March 10, 2009
RF2062 MIST, EPA Reg. No. 2724-790
Your Submission Dated March 26, 2009**

Dear Ms. Huebl:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable:

Wellmark International should note that a notice of availability of EPA's RED for products containing pyrethrins was published in the *Federal Register* on July 26, 2006 (Volume 71, Number 143, Pages 42387-42389). In addition, EPA's RED for products containing piperonyl butoxide was published in the *Federal Register* on July 26, 2006 (Volume 71, Number 143, Pages 42385-42386). Further, EPA's RED for products containing MGK® 264 insecticide synergist was published in the *Federal Register* on July 26, 2006 (Volume 71, Number 143, Pages 42381-42383). As a result, additional data and/or labeling changes may be required for products containing pyrethrins, piperonyl butoxide and/or MGK® 264 insecticide synergist.

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 FIFRA section 12(a)(1)(E). 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.

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A copy of your label stamped "Accepted" is enclosed for your records. 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,

FOR 

Richard J. Gebken
Product Manager (10)
Insecticide Branch
Registration Division (7505P)

Enclosure: Label stamped "Accepted"
002724-00790 D408423

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[] Indicate optional statements

RF2062 MIST

EFFECTIVE

[Insecticide & Deodorant] for dogs, puppies, cats, kittens, horses, ponies

Kills: Ticks, fleas, lice, flies, mosquitoes and gnats

[Kills] ticks that may carry Lyme disease]

An effective spray mist that kills adult fleas

Contains pyrethrins, an adulticide

[Rapid action][quick acting][fast acting] formula

Quickly kills adult fleas on your dog [puppy, cat, kitten]

Rapidly rids your animal of pesky biting fleas and ticks

Kills fleas and ticks reducing itching and scratching

Pleasant [floral] scent

ACTIVE INGREDIENTS:

Pyrethrins (CAS #8003-34-7).....	0.20%
Piperonyl butoxide, Technical (CAS #51-03-6)*.....	0.46%
N-octyl bicycloheptene dicarboximide (CAS #113-48-4)	0.62%
OTHER INGREDIENTS:	98.72%
TOTAL	100.00%

*Equivalent to 0.37% Butylcarbityl (6-propylpiperonyl) ether and 0.09% related compounds

KEEP OUT OF REACH OF CHILDREN CAUTION

See Back Panel For Additional Precautionary Statements

EPA Reg. No. 2724-790

EPA Est No.

Net Contents:

ACCEPTED
With COMMENTS
In EPA Letter Dated:
July 1, 2009
Under the Federal Insecticide, Fungicide
and Rodenticide Act, As amended, for the
pesticide Registered under EPA Reg. No:
2724-790

HOW RF2062 WORKS:

RF2062 kills ticks, lice, mosquitoes, gnats, fleas, house flies, stable flies, horn flies, and face flies.

DIRECTIONS FOR USE

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

General Precautions and Use Restrictions
<ul style="list-style-type: none"> • Apply this product only as specified on this label. • Do not apply to pets (puppies/kittens) less than 12 weeks old. • Avoid spraying of genital areas. • Consult a veterinarian before using this product on medicated, debilitated, aged, pregnant or nursing animals. • Sensitivities 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 this product on horses destined for slaughter. • Do not apply more than one time per day. • Except when applying to pets, Do not apply this product in a way that will contact adults or children, either directly or through drift. • Remove birds and cover fish aquariums before spraying application.

Read and follow all directions and precautions on this product label.

READ ENTIRE LABEL BEFORE EACH USE

USE ONLY ON [DOGS, CATS, PUPPIES, KITTENS][HORSES, PONIES]

SHAKE WELL BEFORE USING. Use only in a well ventilated area.

FOR DOGS AND CATS

For Fleas: A light, even coverage of the hair coat will provide effective flea control. Do not allow spray from application or damp animal to come into contact with painted or finished surfaces, including wood floors/furniture, leather/vinyl materials, or other surfaces of concern. For best penetration [results] ruffle the coat while spraying against the natural lay of the hair. Cover animal's eyes with hand. With a firm fast stroke, to get a proper spray mist, spray head, ears, and chest until damp. Then spray neck, middle and hind quarters, finishing with legs last. With cloth, rub into face around mouth, nose, and eyes. For best penetration of spray to the skin, direct spray against the natural lay of the hair. On long haired dogs, rub your hand against the lay of the hair, spraying the ruffled hair directly behind the hand. Avoid spraying rectum and genitals. Apply at the rate of 1 or 2 squeezes of the trigger sprayer [0.10 fluid ounce] per pound of body weight. For larger dogs, spray until damp, not saturated. Do not allow animals, cats in particular, to become chilled. [Brand Name] may be reapplied weekly, if necessary.

For Ticks: Make sure spray thoroughly wets individual ticks.

FOR PUPPIES AND KITTENS

For Fleas: Do not apply to pets (puppies and kittens) less than 12 Weeks old.

Leaving the eyes, nose, and mouth exposed, treat puppies and kittens weighing less than 3 pounds by wrapping the animal in a towel that has been lightly sprayed with [Brand Name], for 5 to 10 minutes . Or lightly spray a brush or cotton ball and work thoroughly into the hair coat. Fleas may then be removed from the coat by picking or combing. Puppies and kittens over 3 pounds may be treated the same as dogs and cats as described above. [Brand Name] may be reapplied weekly, if necessary. Do not allow animal to become chilled.

FOR PET'S SLEEPING QUARTERS

The pet's bedding should be sprayed, making sure the area beneath the bedding is also sprayed. Do not allow spray from application to come into contact with painted or finished surfaces, including wood floors/furniture, leather/vinyl materials, or other surfaces of concern. After spray has dried, remove old pet bedding and replace with fresh bedding. Do not allow pets to reoccupy sleeping quarters until treated surfaces have thoroughly dried. Treat pets with [Brand Name] flea and tick control products before allowing pets to enter treated areas. Repeat weekly, if necessary.

[FOR HORSES AND PONIES

For Flies: To kill stable flies, horse flies, deer flies, and face flies, first remove excess dirt and dust by brushing coat. Apply spray to legs, shoulders, flanks, neck, top line and other body areas commonly attacked by these flies. To treat face, dampen a cloth with spray and rub on face and head, being careful to avoid eyes. [Brand Name] may be reapplied weekly, if necessary.

STORAGE and DISPOSAL: Do not contaminate water, food or feed by storage or disposal. Do not transfer contents to other containers. **Pesticide Storage:** Store in a cool, dry area away from heat or open flame. Store away from children and animals. **Pesticide/Container Disposal:** Nonrefillable container. **If empty:** Do not reuse or refill this container. Place in trash or offer for recycling if available. **If partially filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS -CAUTION: Causes moderate eye irritation. Harmful if absorbed through skin. Avoid contact with skin, eyes, or clothing. Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove and wash contaminated clothing before reuse. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

HAZARDS TO DOMESTIC ANIMALS - CAUTION: Do not apply to pets (puppies and kittens) less than 12 weeks old. Do not over saturate, especially on cats. Avoid spraying of genital areas. Some cats may be sensitive to products containing pyrethrins. Excessive salivation and ear and paw flicking may occur; however, these effects are temporary and not harmful.

FIRST AID	
Call a poison control center or doctor immediately for treatment advice.	
If in eyes	<ul style="list-style-type: none"> • 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.
If on skin or clothing	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes.
Have the product container or label with you when calling a poison control center, doctor, or veterinarian or going for treatment. For additional information on this product (including health concerns, medical emergencies or pesticide incidents), you may call 1-800-XXX-XXXX.	

[Note: First Aid statement paragraph format may be used if space is limited.]

ENVIRONMENTAL HAZARDS: This product is toxic to aquatic organisms, including fish and invertebrates. Do not contaminate water when disposing of rinsate. See Directions for Use for additional precautions and requirements. Do not apply directly to or near water. Drift and run-off may be hazardous to fish in water adjacent to treated areas.

PHYSICAL HAZARDS: Combustible. Do not use or store near heat or open flame.

WARRANTY AND CONDITIONS OF SALE: To the extent consistent with applicable law, Seller makes no warranty, expressed or implied, concerning the use and handling of this product other than indicated on the label. To the extent consistent with applicable law, Buyer assumes all risks of use and handling of this material when such use and handling are contrary to label instructions.

Wellmark International
 1501 East Woodfield Road 200 West
 Schaumburg, IL 60173

Made in USA

For more information, [or in case of emergency (24 hrs)] call [phone number]
 In case of emergency or for product use information, call [phone number]
 Web site: [URL]