

2724-796

11-10-2011

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

OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

NOV 10 2011

Dr. James McFadden
Senior Regulatory Project Manager
Wellmark International
1501 East Woodfield Road, Suite 200 West
Schaumburg, IL 60173

Dear Dr. McFadden,

Subject: Label Amendment (R340)
Product Name: RF 2042 (CDSO)
EPA Reg. No. 2724-796
Submission dated June 14, 2011

The labeling above, submitted in accordance with the Federal Insecticide, Rodenticide and Fungicide Act, as amended, is acceptable.

A stamped copy of the label and the Companion Animal Safety DER are enclosed for your records. Submit 2 copies of final printed labeling no later than 60 days from the date of this letter. Please contact Kevin Sweeney at (703) 305-5063 if you have questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard Gebken", written over the typed name.

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

Enclosure

RF2042 [CDSO]

Front panel - For Use Only on Toy (6-12 lbs.), Small (13-31 lbs.), Medium (32-55 lbs.) Large (56-80 lbs) , and Extra Large (81 lbs and over) Dogs/Puppies 10 Weeks of age or older

Front panel – ICON - DO NOT USE ON CATS!

[Flea & Tick [& Mosquito][Treatment] [and] Control for Dogs & Puppies 10 weeks of age or older]

Effective on indoor and outdoor dogs/puppies

[(1)[3][4][6] monthly treatments) [1][3][4][6] Months Supply [24][48] doses

Each tube [applicator] [kills fleas & ticks for 3 weeks] and [kills and repels mosquitoes for 3 to 4 weeks]

[Protects for up to [Four/4] Weeks][One month][Four/4 Week [Flea][Tick][Mosquito] Treatment]

[Controls fleas, ticks and mosquitoes for up to one month][Monthly treatment for control of fleas, ticks and mosquitoes

[Aids in Control of Ticks for up to 30 days]

Contains an Insect Growth Regulator (IGR) to kill flea eggs and prevent flea development for [more than 10 weeks] up to [75 days][2.5 months]

[Starts Killing Fleas and Ticks within 15 minutes]

[Kills 85% of ticks within 48 hours][Kills more than 50% of fleas in 2 hours]

[Dual Action kills adult fleas and prevents flea development]

[Breaks Flea Life Cycle for [more than 10 weeks] up to [75 days][2.5 months]

[Controls flea reinfestation for [more than 10 weeks] up to [75 days][2.5 months]

[Kills fleas, ticks, mosquitoes, flea eggs and flea larvae] [Dual protection (against fleas and ticks)]

Kills the Deer Tick, which may transmit Lyme Disease

Kills and Repels mosquitoes (a major carrier of canine heartworm)

[With [S-Methoprene] Insect Growth Regulator [IGR] to Break Flea Life Cycle]

Convenient, easy to use ACCU-TIP DISPENSER [applicator][tube]

Spreads naturally with dog's/puppy's movement (skin and hair oils)

[Formula][Contains lanolin for coat conditioning]

[Water Resistant] [to keep killing fleas and ticks in humid and wet conditions]

[Fast Acting][Long Lasting][Kills Fleas and Ticks by Contact]

[Easy to use] Longer applicator tip for easy application to long-haired dogs/puppies

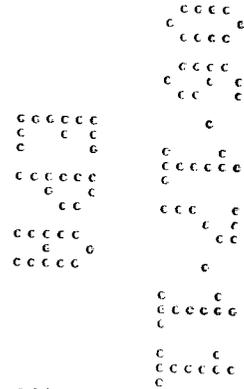
[Fresh][Clean][[Scent][Smell]

[Reapply monthly] [Suitable for year-round use][Month] sticker for home calendar

[Satisfaction guaranteed or your money back]

Alternate Applicator claims: Unique applicator [tube] with flow control

[no drip][no mess][application][applicator][tube]



(Front panel)

ACTIVE INGREDIENTS:

Etofenprox (CAS # 80844-07-1).....	30.0%
S-Methoprene (CAS # 65733-16-6)	3.6%
Piperonyl Butoxide (CAS # 51-03-6)*	5.0%

OTHER INGREDIENTS:..... 61.4%

TOTAL 100.0%

* (butylcarbityl) (6-propylpiperonyl ether) and related compounds

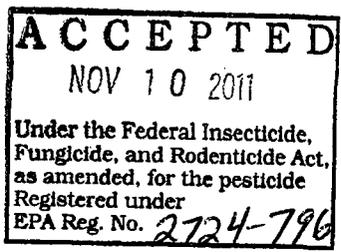
**KEEP OUT OF REACH OF CHILDREN
CAUTION**

See Back Panel for [Ingredients and] Additional Precautionary Statements

NET CONTENTS: One: 0.05 fl oz/(1.5 cc) Applicator [tube] (Toy Dogs)/0.10 fl oz (3.0 cc) Applicator [tube] (Small Dogs)/0.15 fl oz (4.5 cc) Applicator [tube] (Medium Dogs)/0.20 fl oz (6.0 cc) Applicator [tube] (Large Dogs)/0.30 fl oz (9.0 cc) Applicator [tube] (Extra Large Dogs)

EPA Reg. No. 2724-796

EPA Est. No.



RF2042 [CDSO]

**IMPORTANT! DO NOT USE on DOGS/PUPPIES LESS THAN 10 WEEKS of AGE
READ ENTIRE LABEL BEFORE EACH USE. USE ONLY ON DOGS/PUPPIES. DO NOT USE ON
OTHER ANIMALS!**

[Back panel]

DO NOT USE ON CATS

Keep cats away from treated dogs for 24 hours. If applied or ingested, contact your veterinarian immediately.

[RF2042 [CDSO] prevents flea eggs from developing into adult fleas [more than 10 weeks] for up to [75 days][2.5 months]. RF2042 [CDSO] also kills fleas and ticks for 3 weeks and kills and repels mosquitoes for 3 to 4 weeks.][RF2042 [CDSO] treats fleas, ticks, and mosquitoes for up to one month and prevents flea eggs from developing for up to 2.5 months.]

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

USE RESTRICTIONS:

The maximum application rate for this product is twice per month, and the second application must be made more than 8 days after the initial application.

RF2042 [CDSO] works by application directly to the dog's/puppy's skin, not to the hair. When applying, manually push aside dog's/puppy's hair to allow direct application to the skin. Do not get this product in dog's/puppy's eyes or mouth.

[(Note: Application now assumes one applicator per animal per application)]

[Note: Each package contains sufficient tubes/applicators for [X] applications]

FOR [TOY][SMALL][MEDIUM] SIZE DOGS/PUPPIES

1. Bend at perforation and tear off first applicator [tube]. [
- 2: Hold applicator [tube][and bend area of plastic at perforation, tear off and discard.] Hold applicator [tube] upright and snap tip back, away from face and body.
3. The dog/puppy should be standing for easy application. Apply RF2042 [CDSO] evenly to [two spots](toy dogs)[three spots](small or medium dogs) on the top of the back from the shoulder to the base of the tail. At each spot, part the hair until the skin is visible. Place the tip of the tube on the skin and gently squeeze to expel a portion of the solution on the skin. Do not apply an excessive amount of the solution at any one spot that could cause some of the solution to run off the side of the dog/puppy.
4. Do not spread RF2042 [CDSO] by hand over the dog/puppy. Although the dog's/puppy's skin and hair oils will naturally distribute the application over the entire dog/puppy, brushing the dog/puppy 12-24 hours after application will help to distribute the material over the skin..
5. Do not reapply product for 30 days unless re-treatment is required, but not sooner than 8 days after the initial treatment. Do not retreat more than once per month..
6. Discard empty [tube][applicator] as described in Storage and Disposal

[Note: Each package contains sufficient tubes/applicators for [X] applications]

FOR [LARGE][EXTRA LARGE] DOGS

- 1 Bend at perforation and tear off first applicator [tube]. [(Note – multi-application pack)]
- 2 Hold applicator [tube][and bend area of plastic at perforation, tear off and discard.] Hold applicator [tube] upright and snap tip back, away from face and body
- 3 The dog/puppy should be standing for easy application. Apply RF2042 [CDSO] evenly to four or five spots on the top of the back from the shoulder to the base of the tail. At each spot, part the hair until the skin is visible. Place the tip of the tube on the skin and gently squeeze to expel a portion of the solution on the skin. Do not apply an excessive amount of the solution at any one spot that could cause some of the solution to run off the side of the dog/puppy.

[Alternate Directions for Use for multi-tube application

- 3 The dog/puppy should be standing for easy application. Using the first applicator [tube], apply RF2042 [CDSO] evenly to four or five spots on the top of the back from the shoulder to the base of the tail. At each spot, part the hair until the skin is visible. Place the tip of the applicator [tube] on the skin and gently squeeze to expel a portion of the solution on the skin. Do not apply an excessive amount of the solution at any one spot that could cause some of the solution to run off the side of the dog/puppy. Using the second applicator [tube], apply as indicated for first applicator [tube] except start application at base of tail and apply on top of the back to the shoulder.
- 4 Do not spread RF2042 [CDSO] by hand over the dog/puppy. Although the dog's/puppy's skin and hair oils will naturally distribute the application over the entire dog/puppy, brushing the dog/puppy 12-24 hours after application will help to distribute the material over the skin..
- 5 Do not reapply product for 30 days unless re-treatment is required, but not sooner than 3 days after the initial treatment. Do not retreat more than once per month.
- 6 Discard empty [tube][applicator] as described in Storage and Disposal

RF2042 [CDSO] is most effective when used as part of a total flea and tick management program. Use other [Brand Name] products registered for residential area control of these pests in conjunction with this treatment. Monthly treatments are required for optimal control and prevention of fleas.

[The successive feeding activity of fleas on dogs/puppies may elicit a hypersensitivity skin disorder known as flea allergy dermatitis (FAD). Treatment of dogs/puppies with RF2042 [CDSO] rapidly kills fleas and may reduce the incidence of this condition.]

[RF2042 [CDSO] is water resistant and remains efficacious following exposure to rainfall or swimming.]

TREATMENT SCHEDULE			
Dosage: 1 applicator every 30 days per dog/puppy			
Pet's Name	First Treatment Date	Second Treatment Date (30 Days From 1 st)	Third Treatment Date (30 Days From 2 nd)

Reminder: I purchased RF2042 [CDSO] from: _____ NOTES: _____
Treatment table can be expanded based on package size. (6 months)

STORAGE and DISPOSAL: . **Pesticide Storage:** Store in a cool area away from children and animals. **Disposal: If empty:** Do not reuse container [tube][applicator]. 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 AND DOMESTIC ANIMALS - CAUTION

DO NOT USE ON DOGS/PUPPIES LESS THAN 10 WEEKS OLD. For external use only. Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Repeated exposure to etofenprox can cause skin irritation. Consult a veterinarian before using this product on debilitated, aged, pregnant, nursing, or animals on medication. 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. Some dogs may experience hair loss or temporary skin irritation at the application site. If signs persist or become more severe, contact veterinarian immediately and report incident to company at 1-800-XXX-XXXX.

FIRST AID	
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 first 5 minutes, then continue rinsing • Call a poison control center or doctor for treatment advice.
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-XXX-XXXX for emergency medical treatment information.	

WARRANTY AND CONDITIONS OF SALE:

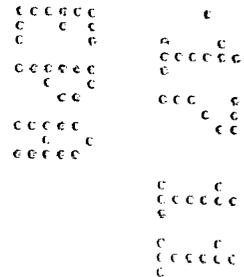
Seller warrants that this product conforms to the chemical specifications expressed on the label. To the extent consistent with applicable law, Seller makes no other warranties, and disclaims all other warranties, express or implied, including but not limited to warranties of merchantability and fitness for the intended purpose. To the extent consistent with applicable law, seller's liability for default, breach, or failure under this label shall be limited to the amount of the purchase price. To the extent consistent with applicable law, Seller shall have no liability for consequential damages.

In case of emergency or for product information, call 1-800-xxx-xxxx.

Wellmark International
1501 E. Woodfield Road. 200W
Schaumburg, Illinois 60173

[URL]

Made in USA



TEXT FOR INDIVIDUAL APPLICATOR

Product name
Etofenprox 30%, S-Methoprene 3.6%, Piperonyl Butoxide 5%
KEEP OUT OF REACH OF CHILDREN
CAUTION
READ DIRECTIONS BEFORE USING
EPA Reg No.
Net Contents

[ICON – DO NOT USE ON CATS]

For Use Only on Toy (6-12 lbs.), Small (13-31 lbs.), Medium (32-55 lbs.) Large (56-80 lbs) , and Extra Large (81 lbs and over) Dogs/Puppies 10 Weeks of age or older