

2724-809

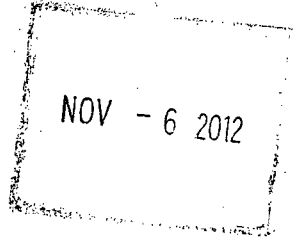
11/6/2012

1/6



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

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION



Mr. James McFadden, Ph.D.  
Wellmark International  
1501 E. Woodfield Rd, Suite 200W  
Schaumburg, IL 60173

Dear Dr. McFadden:

Subject: Label Amendment- efficacy study (MRID 48864701)  
RF2104 Carpet Spray M  
EPA Registration Number 2724-809  
Your submission dated June 15, 2012

The application referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable with the following comments:

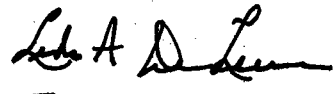
1. On page 1 every claim on the front panel must be clarified with "when applied at the maximum label rate" except for the last 5 claims.
2. On page 1 change the last marketing claim to "For adult flea control only, this product covers up to 2000 feet when applied at the lowest rate."
3. On page 2 change "To apply at a lower rate and cover more area, spray for 12 seconds to cover a 10 x 10 ft. area" to "For adult flea control only: to apply at a lower rate and cover more area, spray for 12 seconds to cover a 10 x 10 ft. area. Do not use the lower rate to control other pests on the label."
4. On page 3 change "For [light] flea/tick infestations, single can treats up to 2000/1000 square feet. To apply at a lower rate and cover more area, spray for 12 seconds to cover a 10 x 10 ft area. [For established flea {tick} infestations and for continued control of fleas [ticks] for 10 to [up to] 14 days, a single can 16 oz. /8 oz. treats 1000/500 square feet.] To apply at the maximum rate, spray for 12 seconds to cover a 5 x 10 ft. area." to

"For newly established or light flea infestations, spray for 12 seconds to cover 100 square feet (10 ft. x 10 ft.). At this rate of application, one can 16 oz./8 oz. will cover 2000/1000 square feet. For established or heavy flea infestations, spray for 12 seconds to cover 50 square feet (5 ft x 10 ft). At this rate one can 16 oz./8 oz. will cover 1000/ 500 square feet."

A copy of the review and a stamped label is enclosed for your records.

If you have any questions regarding this action, please contact Linda A. DeLuise of my team at (703) 305-5428.

Sincerely yours,



Richard Gebken  
Product Manager (10)  
Insecticide Branch  
Registration Division (7504P)

Enclosures

3/6

# RF2104 Carpet Spray M

Controls pre-adult fleas for 7 months [210 days][30 weeks] when applied at the maximum rate  
 Contains Precor® insect growth regulator [Plus Etofenprox, an adulticide]  
 Kills both adult and pre-adult (larvae) fleas  
 Prevents reinfestation and flea build-up for 210 days [7 months][30 weeks] when applied at the maximum rate  
 Kills flea eggs and flea larvae  
 Starts working on contact  
 Stops hatching eggs [flea larvae] [from developing into adult fleas] for 7 months [210 days][30 weeks] when applied at the maximum rate  
 Economical Do-It-Yourself Pest Control  
 Kills flea and ticks and breaks the flea life cycle  
 Controls flea reinfestation for up to 210 days [7 months][30 weeks] when applied at the maximum rate  
 7 month protection [Protects for 7 months] when applied at the maximum rate  
 Quick acting, Long Lasting Flea control  
 Continuous flea protection for 7 months when applied at the maximum rate  
 [Also] Kills fleas, flea eggs, flea larvae, ticks, roaches, ants, spiders, crickets, waterbugs, silverfish, sowbugs, and carpet beetles  
 For use on carpets, rugs, drapes, upholstered furniture, pet bedding, indoor kennels  
 No Oily Residue - No Unpleasant Odor  
 Leaves no lingering odor, no stains, no sticky mess Water based Easy to apply  
 Results when you need them  
 Covers up to 2000 square feet

### ACTIVE INGREDIENTS:

(S)-Methoprene (CAS #65733-16-6).....	0.045%
Etofenprox (CAS # 80844-07-1) .....	0.500%
Prallethrin (CAS # 23031-36-9).....	0.300%
N-octyl Bicycloheptene Dicarboximide (CAS # 113-48-4) .....	0.500%
<b>OTHER INGREDIENTS:</b> .....	<b>98.655%</b>
<b>TOTAL</b> .....	<b>100.000%</b>

**KEEP OUT OF REACH OF CHILDREN**  
**CAUTION**

SEE BACK PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

NET WT. \_\_\_\_\_ oz. ( \_\_\_\_\_ gms.)

EPA Reg. No. 2724-809  
 EPA Est. No.

**ACCEPTED**  
**with COMMENTS**  
 In EPA Letter Dated:

NOV - 6 2012

Under the Federal Insecticide,  
 Fungicide, and Rodenticide Act,  
 as amended, for the pesticide  
 registered under EPA Reg. No.

2724-809

4/6

RF2104 Carpet Spray M [Brand Name] kills adult fleas, hatching flea eggs, flea larvae, and ticks [roaches, ants, waterbugs, silverfish, crickets, spiders, sowbugs, and carpet beetles]. It contains an Insect Growth Regulator (IGR) along with other ingredients to kill the adult fleas and prevent flea larvae from developing into biting adults. Reaches the hiding places of the flea: rugs, carpets, drapes, pet bedding, upholstery and furniture. Protects the household from a buildup of fleas and reinfestation. When applied at the maximum rate, one treatment protects for 210 days [7 months][30 weeks]. For best results, use [Brand Name] spray together with other [Brand Name] products for complete control of fleas and ticks.

**PRECAUTIONARY STATEMENTS**

**HAZARDS TO HUMANS AND DOMESTIC ANIMALS - CAUTION:**

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.

<b>FIRST AID</b>	
<b>IF IN EYES</b>	<ul style="list-style-type: none"> <li>•Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>•Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>•Call a poison control center or doctor for further treatment advice.</li> </ul>
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.	

**PHYSICAL AND CHEMICAL HAZARDS**

Contents under pressure. Do not use or store near heat or open flame. Do not puncture or incinerate. Exposure to temperatures above 130° F may cause bursting. Do not smoke while using this product. Do not allow product to freeze.

**DIRECTIONS FOR USE**

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. READ THE ENTIRE LABEL PRIOR TO USE. USE STRICTLY IN ACCORDANCE WITH ALL LABEL PRECAUTIONS AND DIRECTIONS.

**GENERAL PRECAUTIONS AND RESTRICTIONS**

Do not allow adults, children, or pets to enter the treated area until sprays have dried.

Do not wet articles to point of runoff or drip. Do not use treated article until spray has dried.

Remove or cover exposed food and drinking water before application.

Remove or cover dishes, utensils, food processing equipment, and food preparation surfaces, or wash them before use.

To apply at the maximum rate, spray for 12 seconds to cover a 5 ft X 10 ft area

To apply at a lower rate and cover more area, spray for 12 seconds to cover a 10 X 10 ft area.

**SHAKE WELL BEFORE USE**

**THIS PRODUCT IS NOT FOR USE ON HUMANS OR PETS.**

Do not apply this product in a way that will contact adults, children, or pets either directly or through drift. Remove pets, birds, and cover fish aquariums before spraying.

**Indoors:** Thoroughly vacuum all carpeting, upholstered furniture, along baseboards, under furniture, and in closets. Seal vacuum bag and dispose of in trash outdoors. For [light] flea/tick infestations, a single can (16 oz./8 oz.) treats 2000/1000 square feet. To apply at a lower rate and cover more area, spray for 12 seconds to cover a 10 X 10 ft area. [For established flea [tick] infestations and for continued control of fleas [ticks] for 10 to [up to] 14 days, a single can (16 oz./8 oz.) treats 1000/500 square feet.] To apply at the maximum rate, spray for 12 seconds to cover a 5 ft X 10 ft area. Remove protective cap. Make a test application to upholstery or drapery fabrics in an inconspicuous place before use. Spray RF2104 Carpet Spray M [Brand Name] from 2 feet to 3 feet away from surface being treated. Apply with a smooth back-and-forth motion to carpets, drapes, rugs, and upholstered furniture. A fine mist spray that is evenly applied will do the job properly. Do not spray wood furniture, floors, or trim as water spotting may occur. Repeat treatment as necessary to control fleas and ticks.

**Apply directly to exposed insects - roaches, ants, spiders, crickets, waterbugs, silverfish, sowbugs, and carpet beetles:** Spray areas where these pests are found or may hide, including dark corners of rooms and closets, cracks and crevices, along baseboards and door sills and frames, behind sinks, stoves, refrigerators, and cabinets, and around garbage cans, plumbing and other utility installations. Directly spray pests driven out of hiding places. Spray ant trails, nests, and points of entry. Repeat as necessary.

**On Pet Bedding:** Treat pet bedding and resting places. Apply a uniform application of RF2104 Carpet Spray M [Brand Name] to nearby cracks and crevices, along and behind baseboards, window and door sills, and localized areas of floors where fleas or ticks may be present as these are primary hiding places for fleas. Pet bedding does not need to be removed after treatment.

**Indoor Kennels:**

**REMOVE PETS BEFORE SPRAYING.**

Spray RF2104 Carpet Spray M [Brand Name] from 2 feet to 3 feet away from surface being treated. Apply with a smooth back-and-forth motion. A fine mist spray that is evenly applied will do the job properly. Repeat treatment as necessary to control fleas and ticks. For best results, treat pets with a registered on-animal product before they return to the treated areas.

**STORAGE AND DISPOSAL**

**STORAGE:** Do not store near heat or open flame. Store in cool, dry area away from children.

**CONTAINER DISPOSAL:** Do Not Puncture or Incinerate! **If empty:** Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions.

For information, or in case of an emergency, call 1-800-xxx-xxxx.  
[URL]

*Contains no CFC or other ozone-depleting substances. Federal regulations prohibit CFC propellants in aerosols.*

6/6

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

For information or in an emergency call 1-800-XXX-XXXX

PRECOR® Insect Growth Regulator is a trademark of Wellmark International

Wellmark International  
1501 E. Woodfield Rd. 200W  
Schaumburg IL 60173  
[URL]  
Made in USA

