



OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

February 28, 2025

Noelle Sanfilippo
Regulatory Affairs Specialist
Wellmark International
1501 East Woodfield Road, 200W
Schaumburg, Illinois 60173

Subject: Label Amendment - Registration Review Mitigation for Etofenprox and
Prallethrin
Product Name: RF2104 CARPET SPRAY M
EPA Registration Number: 2724-809
Application Date: March 22, 2021 & May 6, 2024
Decision Numbers: 595776, 596360
Case Number: 480972

Dear Noelle Sanfilippo:

The Agency, in accordance with the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, has completed reviewing all the information submitted with your application to support the Registration Review of the above referenced product in connection with the Etofenprox and Prallethrin Interim Decisions, and has concluded that your submission is acceptable. The label referred to above, submitted in connection with registration under FIFRA, as amended, is acceptable.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide, Fungicide, and Rodenticide Act 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) list 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 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 the EPA's Office of Enforcement and Compliance Assurance.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling and must be used at your next label printing. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 12 months from the date of this letter. After 12 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

If you have any questions about this letter, please contact DeMariah Koger by phone at (202)-566-2288 or via email at koger.demariah@epa.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Linda Arrington", with a stylized flourish at the end.

Linda Arrington, Branch Chief
Risk Management and Implementation Branch 4
Pesticide Re-Evaluation Division
Office of Pesticide Programs

ENCLOSURE: Stamped label

ETOFENPROX	GROUP	3A	INSECTICIDE
PRALLETHRIN	GROUP	3A	INSECTICIDE

(Front Panel)

RF2104 Carpet Spray M

[ABNs]Vet•Kem® Siphotrol® X-Tend™ Home Carpet Aerosol
[ABNs]Vet•Kem® Advanced Carpet Aerosol

Prevention Claims

Controls pre-adult fleas for 7 months [210 days][30 weeks] [**] or [when applied at the maximum label rate]

Kills both adult and pre-adult (larvae) fleas

Prevents reinfestation and flea build-up for 210 days [7 months][30 weeks] [**] or [when applied at the maximum label 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][**] or [when applied at the maximum label rate]

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 label rate

7 month protection [Protects for 7 months] [**] or [when applied at the maximum label rate]

Quick acting, Long Lasting Flea control**

Continuous flea protection for 7 months when applied at the maximum label rate

[Also] Kills fleas, flea eggs, flea larvae, ticks, roaches, ants, spiders, crickets, waterbugs, silverfish, sowbugs, and carpet beetles

Controls Flea Infestations**

**when applied at the maximum label rate

Flea prevention has never been easier

An excellent preventative, offering protection against fleas

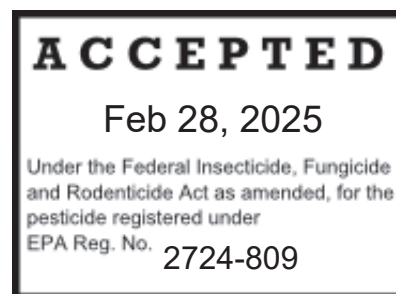
Prevents flea infestations

Prevents flea recurrence

Control flea infestations by preventing them

Flea prevention is the best flea control strategy

It is far easier to prevent fleas than to control them



IGR /Flea egg/life cycle Claims:

Contains [Features][***InfestStop™] an Insect Growth Regulator (IGR) to inhibit the development of flea eggs

Flea control for cats with [PRECOR®][vIGRen®] [***InfestStop™] Insect Growth Regulator (IGR)

[(S)-Methoprene][***InfestStop™] Insect Growth Regulator (IGR) interrupts the development of the flea life cycle [at the egg stage]

[(S)-Methoprene][***InfestStop™] Insect Growth Regulator (IGR) prevents the development of flea eggs into adult fleas and [inhibits the development of flea eggs into adult fleas]

Controlling flea reproduction is the first step in controlling flea populations in your home

[(S)-Methoprene][***InfestStop™] Insect Growth Regulator (IGR) prevents flea [re]infestation

Flea treatment and preventative with an [insecticide] adulticide and [***InfestStop™] Insect Growth Regulator (IGR)

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

Controls [Kills][Lasts][Works][Protects] flea infestations for up to [1 month][4 weeks]

[Contains [***InfestStop™] an Insect Growth Regulator (IGR) to kill flea eggs and prevent flea development for [1 month][30 days][4 weeks]

***** (S)-Methoprene (Must occur on same panel wherever InfestStop™ is used)**

Adulticidal Claims

Kills Fleas Dead

Kills Fleas, [Lone Star, American Dog Ticks and Brown Dog] Ticks, [Oriental, American and German] Cockroaches, [and] [Ants], [Cellar] Spiders, [Sowbugs], [Silverfish], [Crickets] [Carpet Beetles] [Waterbugs] [Firebrats][Argentine Ant][Pavement Ant][Harvester Ant][and other listed insects]

General Product Claims

For use on carpets, rugs, drapes, upholstered furniture, pet bedding, indoor kennels

No Oily Residue - No Unpleasant Odor

Dual-action for immediate and long-lasting effects

Non-Staining Formula

Economical Do-It-Yourself Pest Control

Covers up to 2,000 square feet (16 oz)

Contains Precor® insect growth regulator [Plus Etofenprox, an adulticide]

Starts working on contact

Leaves no lingering odor, no stains, no sticky mess Water based Easy to apply

Money Back Guarantee

Results when you need them

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%

OTHER INGREDIENTS*:98.655%

TOTAL100.000%

* Contains petroleum distillates

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.

Batch/Lot No.

(Back Panel)

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:

Contains petroleum distillates. Harmful if swallowed. Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash hands 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.

FIRST AID	
IF SWALLOWED	<ul style="list-style-type: none">• Immediately call a poison control center or doctor.• Do not induce vomiting unless told to do so by a poison control center or doctor• Do not give any liquid to the person.• Do not give anything by mouth to an unconscious person.
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.• Call a poison control center or doctor for further treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For additional information on this pesticide product (including health concerns, medical emergencies or pesticide incidents), you may contact 1-800-234-2269/1-800-766-7661 twenty-four (24) hours per day, seven (7) days per week .	
Note to Physician/Veterinarian: Contains petroleum distillate. Vomiting may cause aspiration pneumonia.	

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.

Do not allow to enter indoor or outdoor drains. *[No permita la entrada a desagües internos o externos.]*

Follow proper disposal procedures on this label. *[Siga las indicaciones del etiquetado para el desecho apropiado del producto.]*



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.

For indoor use only. 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 newly established or [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:** Do not pour or dispose down the drain or sewer. Call your local solid waste agency for local disposal options..

For information, or in case of an emergency, call 1-800-234-2269,
[www.adamspetcare.com]

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

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 1-800-234-2269,

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InfestStop™ is a trademark of Central Garden & Pet

[Manufactured for:]
Wellmark International
1501 E. Woodfield Rd. 200W
Schaumburg IL 60173
[www.adamspetcare.com]
Made in USA†

†Made in the USA from US and imported ingredients