



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

July 16, 2015

Veronica Semetis Lawless
Regulatory Affairs Specialist
Wellmark International
1501 E. Woodfield Road
Suite 200W
Schaumburg, IL 60173

Subject: Label Amendment – changes to marketing claims
Product Name: RF2177 WB Carpet RTU
EPA Registration Number: 2724-822
Application Date: February 26, 2015
Decision Number: 502289

Dear Ms. Semetis Lawless:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. 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 18 months from the date of this letter. After 18 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.

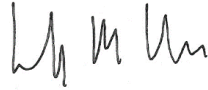
Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded 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.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance

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with FIFRA section 6. If you have any questions, you may contact Elizabeth Fertich at 703-347-8560 or via email at fertich.elizabeth@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Jennifer Urbanski". The signature is fluid and cursive, with the first name being the most prominent.

Jennifer Urbanski, PhD, Product Manager 4
Invertebrate and Vertebrate Branch 1 (IVB1)
Registration Division (7505P)
Office of Pesticide Programs

[] Indicates optional phrase

RF2177 WB CARPET RTU

[water-based][formula]

[with (contains) PRECOR®(vIGRen®) (*Infestop™)(*InfestStop™)(an) (Insect Growth Regulator)]

[with (contains) PRECOR®(vIGRen®)(*Infestop™)(*InfestStop™)(an)(Insect Growth Regulator) plus Etofenprox, an adulticide]

RTU (Ready to Use) Long Lasting For Fleas

[Step X - Indoor] Formula With Etofenprox Effective

[Step X - Pet Protection Program]

Part of the [brand] Home Defense System

[Step 1 –] Protect your pet with [brand] Spot On® treatment

[Step 2 –] Protect your home with [brand][home spray][carpet spray][to kill pests and help keep them from coming back]

[Step 3 –] Kill pests where they live with [brand][yard spray]

Part of [AAA][Triple A][Protection][Defense] (for Adams™ Brand)

Plus Insect Growth Regulator

[7 month[s]][30 weeks][210 days] protection

Protects for [7 months][30 weeks][210 days]

Up to 7 month[s] control

Protects for [over][more than][greater than] half a year

Kills fleas plus kills flea larvae

Kills [visible] [adult] fleas and kills flea larvae [for up to 7 months]

Stops [new][pre-adult][hatching] fleas from developing.

Stops hatching eggs from developing into adult fleas for [7 months][30 weeks][210 days].

Plus kills [flea eggs][&][and][larvae] to prevent future infestations for 7 months [30 weeks][210 days]

Dual action – kills and prevents [new infestations]

Can be used directly on bugs and in places where they hide and breed

Kills pests and helps keep them from coming back

Prevents insect infestations

Contains [*Infestop™][*InfestStop™][an Insect Growth Regulator] [an IGR] [that][which] to kill(s) flea eggs and larvae [to help prevent] [reinfestation][future infestations] for up to 7 months

Contains [*Infestop™][*InfestStop™][an Insect Growth Regulator [IGR] [that][which] to kill(s) flea eggs and larvae] so you can keep your [home] free from reinfestation [future infestations] for up to 7 months

Smarter Pet Care (vs. using a spray without [*Infestop™][*InfestStop™][IGR]) and does not kill flea eggs and flea larvae)

Protect your house [home] from flea [insect] infestations

[Helps] Prevent(s) reinfestation [future infestations]

An important step in breaking the flea life cycle

Non-aerosol [delivery system] [bottle][container] [spray]

Non-aerosol [insert listed bug] killer

The protection you need from [the] [a] brand you trust

Controls reinfestation for 7 months [30 weeks][210 days] from pre-adult [hatching] fleas.

Prevents hatching fleas from becoming full grown.

Kills [controls][pre-adult][hatching] fleas [before they grow up to bite].

Kills [present] [today's] fleas and prevents [new] [tomorrow's] fleas [from growing up to bite].

Kills flea eggs and flea larvae before they [grow up into][develop into][become] biting, breeding adults

Effectively kills [controls] fleas by preventing their development into adults.

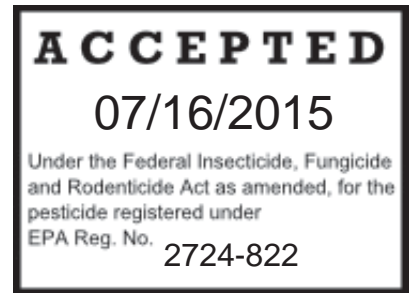
Effectively breaks the flea life cycle

Powerful results when you need it

Powerful results guaranteed(*) or your money back (or with *or your money back)

Prevents flea build-up.

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



Begins killing fleas in 5 minutes.

Long-lasting for Fleas

Targeted spray pattern [provides good coverage][covers hard to reach cracks and crevices]

One treatment works against pre-adult fleas for 210 days [30 weeks][7 months].

Residual action keeps working for 210 days [30 weeks][7 months] against pre-adult fleas.

[No Mercy][Actively] Kills [No][crawling] [flying] [insects] [adult] [fleas], [ticks], [cockroaches], [silverfish], [earwigs], [ants], [scorpions], [spiders], [crickets], [pillbugs], sowbugs [carpet beetles], [confused flour beetles],[centipedes], [darkling beetles], [dermestids], [firebrats], [flies], [fruit flies], [gnats], [Indian meal moths], [lesser grain borers], [millipedes], [mosquitoes], [moths], [red flour beetles], [sawtoothed grain beetles], [wasps], [bed bugs] and [&][other insects] [on contact].

Kills [and prevents] common household insects [bugs][pests]

Kills flying and crawling insects

Kills mosquitoes that may transmit [West Nile Virus],[Chikungunya][and/or] [Dengue Fever] [disease]

Protects [your home] from/against mosquitoes that may transmit [West Nile Virus],[Chikungunya] [and/or] [Dengue Fever] [disease]

Protects [your home] from/against disease carrying mosquitoes

Take back your [home] [house] from [insert listed pest(s)]

Kills [insert listed pest(s)] by contact

A [safeguard][shield][defense] against [adult] [fleas], [flea eggs], [flea larvae], [ticks], [bedbugs], [cockroaches], [silverfish], [earwigs], [ants], [scorpions], [spiders], [crickets], [pillbugs], sowbugs [carpet beetles], [confused flour beetles],[centipedes], [darkling beetles], [dermestids], [firebrats], [flies], [fruit flies], [gnats], [Indian meal moths], [lesser grain borers], [millipedes], [mosquitoes], [moths], [red four beetles], [sawtoothed grain beetles], [wasps], [bed bugs] for your home

Kills bedbugs [and nymphs] for up to 14 days

Easy to Use

[Non-Staining] [and/&] [Fragrance-Free]

No Lingering [chemical] Odor

No unpleasant odor[s]

Effective long term control for Fleas

Controls stages of fleas that don't look like fleas

Use on [For] [carpets], [rugs], [upholstery] [&] and [pet bedding]

[Best if used with][Works well if used with][Use with] other [Brand][flea control] products

Value Pack [\$ off] [Save \$][now][guaranteed to work or your money back]

[Non-aerosol] Package is [100%] Recyclable

Use on [carpets] [rugs] [upholstery] [drapes] [curtains] [furniture] [floors] [luggage] [pet bedding] [pet quarters] [box springs] [&] [mattresses]

For use in [homes] [garages] [attics] [apartments] [hotels] [bedrooms]

Treats up to [XXX] square feet

Kills [insert listed pests] & [insert listed pest]

Powerful results without the mess [of] [powders] [or foggers]

[Works] [Targeted results] fast for fleas only!

Effective long-term control for fleas

Use to kill and prevent bed bugs [for up to] [14 days] [2 weeks]

Kills Ticks, Kills American Dog Ticks, Brown Dog Ticks and Lone Star Ticks

[Targeted] [Ready-to-Use] Spray

Efficient Ready-to-Use [Spray] [Formula]

Tough on pests, easy on your [home] [furniture] [carpets] [upholstery]

Tough on pests, not on your [home] [furniture] [carpets] [upholstery]

With AMDRO, it's Game Over for [insert listed pest(s)]

Kills pests that pets can bring inside

To Learn How to Apply, Scan the QR Code [with QR Code] at adamsfleacontrol.com, vet-kem.com, biospotactivecare.com or amdros.com

ICONS for Flies, Ticks, Mosquitoes, other listed pests



[Front panel]

ACTIVE INGREDIENTS:

(S)-Methoprene (CAS #65733-16-6)..... 0.01%

Etofenprox (CAS #80844-07-1).....0.50%

Piperonyl Butoxide*: (CAS #51-03-6)..... 2.00%

OTHER INGREDIENTS:.....97.49%

Total 100.00%

*(butyl carbityl) (6-propylpiperonyl ether) and related compounds

KEEP OUT OF REACH OF CHILDREN

See [Back][side] [Panel(s)][label] for Additional Precautionary Statements

EPA Reg. No. 2724-822

EPA Est. No.

Batch/Lot No.

Net Contents: 24 fluid ounces

HAZARDS TO HUMANS AND DOMESTIC ANIMALS:

Wear long-sleeved shirt and long pants, socks, shoes and gloves.

USER SAFETY RECOMMENDATIONS:

User should wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.

User should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

READ ENTIRE LABEL BEFORE EACH USE.

DO NOT SPRAY ON PETS OR HUMANS.

[Brand Name][noun] is formulated to stop hatching eggs from developing into adult fleas and kill pre-adult fleas (larvae) before they grow up to bite. [RF2177 WB Carpet RTU [Brand name][noun] contains a unique combination of ingredients that kills pre-adult fleas before they grow up to bite and kills adult fleas.] It reaches [and kills] fleas hidden in carpets, rugs, upholstery, and pet bedding. It safeguards [protects] your home from flea build-up, while protecting your pets and family from bites. Use in homes, garages, attics and apartments.]

RF2177 WB Carpet RTU [Brand name][noun] kills adult and pre-adult fleas. It prevents pre-adult fleas from hatching into adult biting fleas for 7 months [30 weeks][210 days]. One treatment gives continuous protection against pre-adult fleas for 7 months [210 days][30 weeks].

RF2177 WB Carpet RTU [Brand name][noun] kills fleas, [ticks], [cockroaches], [silverfish], [earwigs], [ants], [scorpions], [spiders], [crickets], [pillbugs], sowbugs [carpet beetles], [confused flour beetles],[centipedes], [darkling beetles], [dermestids], [firebrats], [flies], [fruit flies], [gnats], [Indian meal moths], [lesser grain borers], [millipedes], [mosquitoes], [moths], [red flour beetles], [sawtoothed grain beetles], [wasps], and [&][other insects] [on contact]. This product is designed for use on all fabrics and carpeting; however, some natural fibers [such as wool] and synthetics may be adversely affected by any liquid product - always test a hidden area

prior to use. [Lighter colored carpets may show some soiling after treatment. To help avoid soiling carpets, allow product to dry completely before walking on treated areas.]

To protect your pet against fleas outdoors, use a [brand name] flea or flea and tick collar, [brand name] pet dust [powder], [brand name] pet spray, [brand name] pet sponge-on, [brand name] pet topical, [brand name] pet shampoo, or other appropriate product registered for on-animal use.

DIRECTIONS FOR USE

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

Shake well before using.

Fleas: Use RF2177 WB Carpet RTU [Brand name][noun] in homes, [garages],[attics], [apartments] and [hotels]. One bottle will treat a surface area equivalent to [350 sq. ft.] approximately [3] [10' X 11.5'] rooms. A fine spray applied uniformly is all that is necessary to kill fleas. Do not wet furniture and carpeting. Remove birds and cover aquariums before spraying. For maximum effectiveness, treat entire carpeted area. Treat carpets, rugs, drapes and all surfaces of upholstered furniture. Remove old pet bedding and replace with clean fresh bedding after treatment of pet area. Reapply every 2 weeks if necessary. Vacate treated areas and do not return for at least one hour.

Avoid contamination of food and foodstuffs. Do not use in the edible product areas of food processing plants, restaurants, or other areas where food is commercially prepared, processed, stored, or served.

To kill [ticks], [cockroaches], [silverfish], [earwigs], [ants], [scorpions], [spiders], [crickets], [pillbugs], sowbugs] [carpet beetles], [confused flour beetles],[centipedes], [darkling beetles], [dermestids], [firebrats], [flies], [fruit flies], [gnats], [Indian meal moths], [lesser grain borers], [millipedes], [mosquitoes], [moths], [red flour beetles], [saw-toothed grain beetles], wasps], and [&][other insects] in the environment, apply directly to pests.

Bed Bugs: Thoroughly inspect areas of suspected bed bug infestation and note potential or actual sites where bed bugs hide. [(For professional use products) -Instruct residents to] Remove or pick up clothing and other obstacles that prevent thorough inspection or treatment. Remove and sanitize infested bedding, clothing, or other items. **Do not apply to bedding. Wash bedding and dry using medium to high heat to kill bed bugs.**

Apply [brand name][noun] to areas where bed bugs live, especially hidden sites. Apply thoroughly as a spot, crack and crevice, or surface application. Focus applications to hidden sites such as behind dressers, cove base, under carpets and furniture, inside and on box springs, under beds, behind mirrors and pictures, and other locations where bed bugs hide.

Apply as a surface application to carpeting, drapes, and flooring at the rate of ¼ fl oz/3.6 ft² (about 8 pumps). Apply [Brand name][noun] directly to mattresses, **do not saturate the mattress**, focus applications on seams and folds. Allow mattress to dry thoroughly before replacing bedding.

STORAGE AND DISPOSAL: Pesticide Storage: Store in original container away from children. Protect from freezing or high temperatures. **Pesticide Disposal:** Nonrefillable container. Do not reuse or refill this container. **If empty:** 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.

[Unconditional Money-Back Guarantee]

[For more information about flea and tick problems and how to solve them, call 1-800-XXX-XXXX weekdays, (time)]

* [Refund if not satisfied.]

[Satisfaction 100% guaranteed or your money back]

[If not completely satisfied with this product, return it to place of purchase with your receipt for a full refund.]

[[Brand] Satisfaction Guarantee: If, after following instructions, you are not satisfied with product results, send your name, address, and proof of purchase (original dated receipt) to: [Brand] Refund, [registrant address]

In case of emergency or for product use information, call [phone number] or visit our Web site: (adamsfleacontrol.com)(vet-kem.com)(biospotactivecare.com)(amdoro.com)

For [more] information [about Brand name products] or in an emergency, call 1-XXX-XXX-XXXX [weekdays from][time].

To learn more about treating current infestations and preventing future outbreaks, please visit our website (adamsfleacontrol.com)(vet-kem.com)(biospotactivecare.com)(amdoro.com)

To learn more, visit (adamsfleacontrol.com)(vet-kem.com)(biospotactivecare.com)(amdoro.com)

For more information, call our flea and tick experts at 1-800-XXX-XXXX

Seller makes no warranty, express or implied, concerning the use of this product other than indicated on the label. Buyer assumes all risks of use and handling of this material when such use and handling are contrary to label instructions.

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