

8/31/98

PM 03

4758-175

129/183

AUG 31 1998

Bill Washburn  
Pet Chemicals  
P.O. Box 18993  
Memphis, TN 38181-0993

Subject: Additional Efficacy Claim For:  
Linalool Plus Carpet Powder  
EPA Registration No. 4758-175  
Application dated February 9, 1998  
FAX dated August 5, 1998

Dear Mr. Washburn:

The proposed amendment to the registration for product cited above under The Federal Insecticide, Fungicide, And Rodenticide Act, as amended adding an additional efficacy claim is acceptable subject to the comment listed below:

Add the statement, "When using this product at the lower rate allow the powder to remain in place for 24 hours before vacuuming.", to the label.

Refer to the review enclosed with our letter dated July 20, 1998 which stated that "at the low rate allowing the powder to remain in place for 24 hours before vacuuming appears crucial to effectiveness".

Submit Two (2) copies of the corrected finished label before the product is released for shipment under this amended labeling.

If you have any questions or comments please contact Joseph Tavano at (703) 305-6411.

Sincerely,

*Joseph M. Tavano*  
for Marion J. Johnson, Jr.  
Product Manager 10  
Insecticide Branch  
Registration Division (7505C)  
*Jm*

## LINALOOL PLUS CARPET POWDER

Kills Flea & Ticks on Carpet & Upholstered  
Furniture

Contains Nylar® Insect Growth Regulator  
Contains the botanically derived insecticide  
Linalool

Fresh Pleasant Citrus Scent

Treats up to 400 Square Feet

Kills all four stages of the flea - ADULTS,  
EGGS, LARVAE and PUPAE

Breaks the Flea Life Cycle and controls  
reinfestation for up to 365 days

### ACTIVE INGREDIENTS:

Linalool .....	2.500%
Piperonyl Butoxide, Technical* .....	0.500%
Pyrethrins .....	0.075%
Nylar: 2-(1-methyl-2-(4-phenoxyphenoxy)ethoxy) pyridine** .....	0.020%

INERT INGREDIENTS: ..... 96.905%

\* Equivalent to 0.4% (Butylcarbityl)(6-propylpiperonyl) ether and  
0.1% related compounds.

\*\* Nylar is a Registered Trademark of McLaughlin Gormley King

### KEEP OUT OF REACH OF CHILDREN

### CAUTION

See back panel for precautionary statements

EPA Reg. No. 4758-175

EPA Est. No. 11715-TN-1

Net Contents: \_\_\_\_\_ oz. (\_\_\_\_\_ g.)

Manufactured by:

Pet Chemicals

P.O. Box 18993

Memphis, TN 38181-0993

### 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.

One 16 ounce canister contains enough powder to  
treat 1 to 2 rooms (200 - 400 square feet). Apply  
powder more heavily to areas of flooring or  
furniture on which pets spend most of their time.  
Apply to dry surfaces only. Do not wet powder.

**Carpets:** Shake powder evenly across surface.  
Brush lightly with broom to force powder deep into  
carpet where fleas and their larvae exist. Wait at  
least 60 minutes before (lightly) vacuuming to  
remove visible surface powder. For maximum  
efficacy, delay vacuuming for up to 24 hours.

**Upholstery:** Remove loose cushions. Sprinkle  
along creases and into corners. Brush lightly to  
work powder into folds and creases. Vacuum to  
remove visible powder on surfaces. Do not use on  
exposed fabric without first testing on a hidden  
surface for effects on color (staining) or texture. If  
powder adheres to a spot, brush out and vacuum  
that area immediately.

When emptying vacuum bag after use, wrap  
contents or disposable bag in several layers of  
newspaper and discard in trash.

Treat pets with a registered flea and tick control  
product prior to re-entry.

### 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 or smoking. Do not contaminate  
feed, water or foodstuffs. Do not apply to food  
processing surfaces or use in food processing areas  
where food is exposed. Cover fish aquariums  
before use. Keep children and pets off treated  
carpet and upholstered furniture during treatment  
and while powder is still visible on their surfaces.

#### STATEMENT OF PRACTICAL TREATMENT

**If in Eyes:** Flush eyes with plenty of water. Get  
medical attention if irritation persists.

#### STORAGE AND DISPOSAL

**STORAGE:** Store in a cool, dry area inaccessible  
to children and pets.

**DISPOSAL:** Do not reuse empty container. Wrap  
container and put in trash collection.

This container is sold by weight, not by volume.  
You can be assured of proper weight even though  
some settling of contents normally occurs during  
transportation and handling.

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Amended to Add Square Footage Claim

