

JUN 1 1988

Mr. Jan Brill
Regulatory Specialist
Fairfield American Corporation
809 Harrison Street
Frenchtown, NJ 08825

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Dear Mr. Brill:

Subject: Formulation Amendment to Replace Allethrin with Esbiothrin and
Labeling Amendment Reflecting This Change - Response to the
Allethrin Registration Standard
EPA No. 4816-572

The amendments referred to above, submitted in connection with
registration under Section 3(c)(7)(A) of the Federal Insecticide, Fungi-
cide and Rodenticide Act, as amended (FIFRA), are acceptable provided that
you:

1. Agree in writing that you will submit and/or cite all data required
for registration/reregistration of your product under FIFRA Section
3(c)(5) when the Agency requires all registrants of similar products
to submit such data.
2. Submit a complete product chemistry data matrix on the new formulation
described in your Confidential Statement of Formula dated 8/22/88.
3. On the label replace "Allethrin" with "Esbiothrin."
4. Replace the Statement of Practical Treatment with

STATEMENT OF PRACTICAL TREATMENT

If Swallowed: Do not induce vomiting. Call a physician
or Poison Control Center immediately.

If Inhaled: Remove to fresh air.

If On Skin: Remove contaminated clothing and wash
affected areas with soap and water.

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CONCURRENCES

SYMBOL								
SURNAME								
DATE								

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

Note To Physician: Contains petroleum distillate. Vomiting may cause aspiration pneumonia.

5. Replace

"This product is toxic to fish. Keep out of lakes, streams or ponds. Do not contaminate water by cleaning of equipment or disposal of wastes."

with

"This pesticide is highly toxic to fish. Do not apply directly to water or wetlands (swamps, bogs, marshes, and potholes). Drift from treated areas may be hazardous to organisms in adjacent aquatic sites. Do not contaminate water when disposing of equipment washwaters."

If the conditions of these amendments are not complied with after acceptance, the registration will be subject to cancellation in accordance with Section 6(e) of the Act.

Submit five (5) final printed labels (labeling) within 75 days. (If finished labeling cannot be furnished within the 75-day period, an extension should be requested.)

Sincerely yours,



Phil Hutton
Product Manager (17)
Insecticide-Rodenticide Branch
Registration Division (H7505C)

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ALLEVIATE® EQUINE INSECTICIDE E.C.

EPA Reg. No. 4816-572

EPA Est. No. 279 NY-1

StabileNE - Registered trademark of Union Carbide Corporation

Contains Allethrin and StabileNE

For use on Horses and Ponies

This concentrate may be diluted with water or oil.

Kills and repels horse flies, stable flies, face flies, horn flies, deer flies, house flies, mosquitoes, and gnats.

Kills fleas, lice and ticks.

Effective for use as a wipe on or as a spray on the animal as well as a space spray in horse barns, stables or tack rooms.

ACTIVE INGREDIENTS:

d/l-allethrolone d-trans chrysanthemate	0.750%
Related Compounds	0.060%
*Piperonyl Butoxide Technical	7.500%
Butoxypolypropylene Glycol	53.000%
INERT INGREDIENTS	38.690%
	100.000%

*Equivalent to 6X (butylcarbityl) (6-propyl-piperonyl) ether and 1.5% related compounds

STABLENE - Registered trademark of Union Carbide Corporation

ALLEVIATE - Registered trademark of Fairfield American Corporation

KEEP OUT OF REACH OF CHILDREN

CAUTION

Harmful if swallowed. If swallowed, do not induce vomiting; call a physician. See side panel for additional precautions.



FAIRFIELD
AMERICAN
CORPORATION

201 Route 17 North, Rutherford, N.J. 07070

ACCEPTED
with COMMENTS
in EPA Letter Dated:

1990

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide 4816-572 EPA Reg. No.

STATEMENT OF PRACTICAL TREATMENT

- If Swallowed: Do not induce vomiting unless directed by a physician. Petroleum distillate may cause aspiration. Contact a physician immediately.
- If In Eyes: Flush eyes with plenty of water. Contact a physician if irritation persists.
- If Inhaled: Remove victim to fresh air. Apply artificial respiration if indicated.
- If On Skin: Remove contaminated clothing and wash affected areas with plenty of soap and water.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

PESTICIDE STORAGE AND SPILL PROCEDURES: Store upright at room temperature. Avoid exposure to extreme temperatures. In case of spill or leakage, soak up with an absorbent material such as sand, sawdust, earth, fuller's earth, etc. Dispose of with chemical waste.

PESTICIDE DISPOSAL: Pesticide, spray mixture or rinse water that cannot be used according to label instructions must be disposed of at or by an approved waste disposal facility.

CONTAINER DISPOSAL: Triple rinse (or equivalent) then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other approved State and local procedures.

CONTAINERS ONE GALLON AND SMALLER: Do not reuse container. Wrap container in several layers of newspaper and discard in trash.

DIRECTIONS FOR USE

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

DIRECTIONS FOR USE ON HORSES AND PONIES

Brush the animal thoroughly to remove loose dirt and dust.

Prepare the appropriate dilution of this concentrate in the amount required for immediate use (about one quart per horse). Diluted, this concentrate should be used within 24 hours.

TO KILL AND REPEL HOUSE FLIES, HORN FLIES, GNATS, AND MOSQUITOES

Dilute 1 part concentrate with 14 parts water.

TO KILL AND REPEL HORSE FLIES, STABLE FLIES, DEER FLIES AND FACE FLIES

Dilute 1 part concentrate with 9 parts water.

Use as a water spray or moisten a folded 12" square piece of turkish toweling with the solution.

CO
Rub against, attention to and shanks. Avoid contact thoroughly. If desired, enhance by 1. For best results TO KILL & REPEL. Using a dilution of 1 part concentrate to 9 parts water, the skin of the animal is necessary. To repel, saturate the animal with sleeping quarters. Saturate a cloth directly on the nostrils. IN HORSE BARN. To control flies at a rate of 1 ounce per 10 or oil and apply spray toward the area is 1 ounce per 10 results, close and keep them. Saturate the area. Repeat application.

PRECAUTIONS
HAZARD

Do not contaminate water, food or feed by storage or disposal.

ENVIRONMENTAL

This product is not to be used on horses, lakes, streams, water by clean tastes.

Buyer assumes all risk of use in accordance with directions.

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