

PM 03  
4822-461  
01/11/99

United States Environmental Protection Agency

January 11, 1999

Mr. Stuart McArthur  
S.C. Johnson & Son, Inc.  
1525 Howe Street  
Racine, WI 53403

Subject: Label Amendment to comply with PR Notice 96-6  
Whitmire Residual Pressurized Flea and Tick Spray for Dogs and Cats  
EPA Reg. No. 4822-461  
Your submission dated September 14, 1998

Dear Mr. McArthur:

The labeling referred to, above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments listed below. Two (2) copies of the finished labeling must be submitted prior to releasing the product for shipment. A stamped copy of the label is enclosed for your records.

- 1) Please update your "Ingredients Statement" so that your active and inert ingredients add up to 100%. Based on your CSF, it would seem that your "Related Compounds" should be "0.004%" rather than the "0.0004%" which is listed on your label, but you must make this determination.
- 2) Based on your tox categories, please rewrite your First Aid Statement to read the following:

**IF IN EYES:** Flush eyes with plenty of water. Call a physician if irritation persists.

**IF ON SKIN:** Wash with plenty of soap and water. Get medical attention

SYMBOL ▶	750X if symptoms or irritation occur.						
SURNAME ▶	Keigwin						
DATE ▶	1/11/99						

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**IF SWALLOWED:** Call a physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. If person is unconscious, do not give anything by mouth and do not induce vomiting.

**IF INHALED:** Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. Get medical attention.

Please note that your "IF SWALLOWED" and "IF INHALED" statements are optional since they are Tox Category IV. Since you had label statements on your submitted label we have provided this suggested wording for you.

- 3) Please rewrite your Hazard to Human and Domestic Animals statement to read the following:

**CAUTION:** Causes moderate eye irritation. Harmful if absorbed through skin. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

- 4) Please delete the last paragraph beginning with "For cats apply at a rate of 1 second per pound of body weight...". Your application times seem objectionably long. For instance, an adult golden retriever averaging 80 lbs could very well have your product applied for over 10 minutes! This seems excessive, particularly since using an aerosol product that long non-stop would almost certainly be a hazard to both animal and applicator alike from the resulting fumes.

- 5) The efficacy data from the product you originally cited (EPA Reg. No. 1021-1542) does not support a claim for 7 day tick control on dogs. The data support a 14-day flea control on dogs and cats, a 4-day tick control claim on dogs and a 9-day tick control claim on cats. Please change your label accordingly.

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If you have any questions regarding this action, please contact Tracy Keigwin of my team at (703) 305-6605.

Sincerely,

George T. LaRocca  
Product Manager 13  
Insecticide Branch  
Registration Division (7505C)

CONCURRENCES

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Label 4822-461 - Per PR Notice 96-6 - 5/1/98

WHITMIRE RESIDUAL PRESSURIZED FLEA & TICK  
SPRAY FOR DOGS AND CATS

- \* PRESSURIZED SPRAY RESIDUALLY KILLS FLEAS AND TICKS ON DOGS AND CATS
- \* KILLS FLEAS UP TO 14 DAYS AND TICKS UP TO 7 DAYS ON DOGS AND CATS

ACTIVE INGREDIENTS:

Pyrethrins . . . . .	0.0560%
Permethrin. . . . .	0.0500%
Related compounds . . . . .	0.0004%

INERT INGREDIENTS: . . . . .	<u>99.8900%</u>
	100.0000%

NET WEIGHT

KEEP OUT OF REACH OF CHILDREN  
CAUTION

See Back Panel For Additional Precautionary Statements

ACCEPTED  
with 4822-461  
to EPA Notice dated

JAN 11 1999

4822-461

[To appear, in all caps, at the top of the rear or side panel]  
**READ ENTIRE LABEL BEFORE EACH USE.**

[To immediately follow the preceding statement, in bold and caps]  
**FOR USE ONLY ON DOGS OR CATS**

#### **FIRST AID**

If swallowed: Call a physician.

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

If on skin: Wash with soap and warm water.

If inhaled: Remove victim to fresh air and call a physician if effects occur.

#### **PRECAUTIONARY STATEMENTS:**

##### **HAZARDS TO HUMAN AND DOMESTIC ANIMALS**

**CAUTION:** Harmful if swallowed. Avoid breathing vapors. Do not spray in eyes, face or on genitalia.

**PHYSICAL OR CHEMICAL HAZARDS: EXTREMELY FLAMMABLE.** Do not use or store near fire, sparks, or heated surfaces. Turn off pilot lights in gas appliances and unplug or turn off electrical equipment in the use area. After airing out phase is completed, relight pilot lights and reconnect electrical current. Do not smoke in the use area. Contents under pressure. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting. Incineration of container may cause explosion.

**DIRECTIONS FOR USE:** It is a violation of federal law to use this product in a manner inconsistent with its labeling.

**HOLD CONTAINER UPRIGHT. SHAKE BEFORE USE.**

Spray the animal from a distance of 8-12 inches. Start spraying at the tail, moving the dispenser rapidly and making sure that the animal's entire body is covered, including the legs and under the body. As you spray, fluff the hair so that spray will penetrate to the skin. The spray should wet the ticks thoroughly. Do not spray into the face, eyes, or on genitalia.

For cats apply at the rate of 1 second per pound of body weight. For dogs apply at the rate of 2 seconds per pound of body weight for thin or short-haired dogs and up to 8 seconds per pound of body weight for heavy or long-haired dogs.

**Repeat every week.**

**Do not use on dogs or cats under 12 weeks.**

**Consult a veterinarian before using this product on debilitated, aged, pregnant, nursing, or medicated animals.**

**Sensitivities may occur after using ANY pesticide product for pets. If signs of sensitivity occur bathe your pet with mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately.**

**STORAGE AND DISPOSAL STATEMENTS:**

**STORAGE:** Store in a cool area away from heat and open flame.

**DISPOSAL:** Replace cap and discard container in trash. Do not incinerate or puncture.

Questions? Comments? Call 800-558-5252 or write Helen Johnson.

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EPA Reg. No. 4822-461

EPA Est. No. 499-MO-1