

7 MAR 1996

T. Bradley Jones  
Ritter Chemical Co.  
P.O. Box 801854  
Houston, TX 77280

Dear Mr. Chandler:

Subject: Response to Dipropyl Isocinchomeronate DCI  
Ritter's Flea & Tick Spray  
EPA Registration Number 9468-31  
Submission Dated August 11, 1994

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:

1. Delete the Petroleum Distillate from the active ingredients listing and add the same percentage to the Inert Ingredients declaration.
2. Revise the Physical or Chemical Hazards Statement to read as follows:  
  
"Flammable. Keep away from heat or open flame. Do not use this product in or on electrical equipment due to possibility of shock hazard."
3. Move the heading "DIRECTIONS FOR USE" and the statement "It is a violation of Federal law to use this product in a manner inconsistent with its labeling." to the beginning of the Directions for Use section.
4. Revise the "IF IN EYES" Statement of Practical Treatment to read as follows:  
  
"Hold eyelids open and flush eyes with a steady, gentle stream of water for 15 minutes. Get medical attention."

In addition, you must submit a 1-year storage stability study. This requirement was included in the Notice of Registration issued to your company on September 13, 1990.

2.43

A stamped copy of the label is enclosed for your records. Submit three copies of revised final printed labeling prior to releasing product for shipment.

If you have any questions or comments, please contact me at (703) 305-6788.

Sincerely,

RPK

Richard P. Keigwin, Jr.  
Product Manager 10  
Insecticide-Rodenticide Branch  
Registration Division (7505C)

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PRECAUTIONARY STATEMENTS  
HAZARDS TO HUMANS & DOMESTIC ANIMALS

**WARNING**

NOT FOR USE ON ANIMALS TO BE USED  
AS A SOURCE FOR FOOD OR FEED

**HUMANS:** Harmful if swallowed or inhaled. Avoid breathing spray mist. Avoid contact with skin or eyes. Avoid contamination of feed or foodstuffs. Wash hands with soap and water after using.

**ANIMALS:** Avoid contact with animal's eyes. Do not use on nursing animals. If treatment is necessary, spray on fingertips and rub into coat.

**ENVIRONMENTAL HAZARDS**

This product is toxic to aquatic organisms. Do not apply directly to water. Do not contaminate water when disposing of equipment washwaters.

**PHYSICAL OR CHEMICAL HAZARDS**

**FLAMMABLE: KEEP AWAY FROM HEAT OR OPEN FLAME.**  
STATEMENT OF PRACTICAL TREATMENT

**IF SWALLOWED:** Do not induce vomiting. CALL A PHYSICIAN OR POISON CONTROL CENTER IMMEDIATELY.

**IF IN EYES:** Flush with plenty of water. See a physician immediately.

**IF ON SKIN:** Wash with soap and water. Get medical attention if irritation persists.

**DIRECTIONS FOR USE**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Do not use this product in or on electrical equipment due to possibility of shock hazard.

LOT NO.: SEE BOTTOM OF BOTTLE

*Ritter's*  
**FLEA & TICK SPRAY**

FOR CATS — KITTENS — PUPPIES — DOG HOUSES  
For the control of Fleas, Ticks and Lice on Dogs, Cats, and Horses, and for temporarily repelling Gnats, Mosquitoes and Biting Flies.

**ACTIVE INGREDIENTS:**

Pyrethrins.....	0.15%
Piperonyl butoxide, technical.....	1.50%
(N-octyl bicycloheptene dicarboximide).....	0.50%
(Di-n-propyl isodichromerate).....	0.50%
Petroleum distillate.....	1.35%
**INERT INGREDIENTS.....	96.00%
TOTAL - 100.00%	

\* Equivalent to 1.2% (butylcarbitol) (6-propylpiperonyl) ether and 0.3% related compounds

\*\* Inert ingredients include a grooming agent to ease combing and brushing of coat to remove dead fleas, ticks and lice.

**KEEP OUT OF REACH OF CHILDREN  
WARNING**

SEE SIDE PANELS FOR ADDITIONAL PRECAUTIONARY STATEMENTS

MANUFACTURED FOR:  
**RITTER CHEMICAL COMPANY**  
P.O. BOX 801854 HOUSTON, TX 77280

EPA Registration No. 9468-31  
EPA Est. No. 47258-TX-01

NET CONTENTS  
16 FL. OZ. (473 ml)

**DIRECTIONS:**

USE ONLY IN A WELL VENTILATED AREA. REMOVE BIRDS AND COVER AQUARIUMS BEFORE SPRAYING. REMOVE SAFETY CAP AND INSERT SPRAYER.

**CATS AND DOGS:** Cover animal's eyes with hand and with a 2 in fast stroke, to get a proper spray mist, spray head, ears, and chest until damp. With finger tips, rub into face and around mouth, nose and eyes. Then spray neck, middle and hind quarters, finishing legs last. For best penetration of spray to the skin, direct spray against the natural lay of the hair. On long haired dogs rub your hand against the lay of the hair, spraying the ruffled hair directly behind the hand. Make sure spray thoroughly wets ticks. Repeat treatment as needed.

**PUPPIES AND KITTENS:** Treat same as cats and dogs except nursing puppies and kittens, spray only along back of on your finger tips and rub in with your finger tips.

**PET SLEEPING QUARTERS:** Spray around baseboards, windows, door frames, wall cracks and local area of floors. If mosquitoes, gnats or flies are present, spray lightly into the air. Repeat as needed. The bedding should be sprayed and then replaced with fresh bedding for best results.

**HORSES:** To control stable flies, horse flies, deer flies and face flies apply to face, legs, flanks, lopline and other body areas commonly attacked by these flies. Repeat treatment as needed.

**STORAGE AND DISPOSAL**

Do not contaminate food or foodstuffs by storage or disposal. Do not reuse empty container. Wrap empty container and put in trash collection.

**BEST AVAILABLE COPY**