



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460-0001

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

January 17, 2008

Ms. Heather R. Bjornson,
Regulatory Agent for Ritter Chemical Company
c/o Technology Sciences Group, Inc.
1150 18th Street, NW, Suite 1000
Washington, DC 20036-3840

**Subject: Updates of First Aid, Storage and Disposal & Other Precautionary Statements
Ritter's Flea & Tick Spray, EPA Reg. No. 9468-31
Your Submission Dated November 13, 2007**

Dear Ms. Bjornson:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable with the following provision(s):

Marketing Claims section comment(s):

1. Revise the 1st marketing claim to read: "FOR CATS – KITTENS – DOGS – PUPPIES – DOG HOUSES."
2. On the 2nd marketing claim, insert the words "Over 12 Weeks Old" immediately following the word "Cats."

Ingredient Statement section comment(s):

3. Replace this section with:

ACTIVE INGREDIENTS:

Pyrethrins	0.15%
*Piperonyl Butoxide, Technical	1.50%
** (N-octyl bicycloheptene dicarboximide)	0.50%
*** (Di-n-propyl isocinchomeronate)	0.50%
**** OTHER INGREDIENTS	<u>97.35%</u>
Total	100.00%

*Equivalent to 1.20% (butylcarbityl) (6-propylpiperonyl) ether and 0.30% related compounds.

**MGK[®] 264 Insecticide Synergist

***MGK[®] Repellent 326

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

First Aid section comment(s):

4. Replace the 4th and 5th rows of the existing First Aid section (table) with:

If on Skin or Clothing:	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
<p>Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For additional information on this pesticide product (including health concerns, medical emergencies or pesticide incidents), you may call 1-800-xxx-xxxx or the National Pesticide Information Center at 1-800-858-7378.¹</p>	

Precautionary Statements, Hazards to Humans and Domestic Animals section comment(s):

5. Delete all text in this section immediately following the signal word "**WARNING**" that has been marked with "~~strikethrough~~" and replace with: "Harmful if swallowed or inhaled. Avoid breathing spray mist. Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco. Avoid contamination of food or feedstuffs."

Precautionary Statements, Environmental Hazards subsection comment(s):

6. Replace the section with: "This product is toxic to aquatic organisms, including fish and invertebrates. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment wash-water or rinsate. See Directions for Use for additional precautions and use restrictions."

Precautionary Statements, Physical or Chemical Hazards subsection comment(s):

7. Replace this section with: "Flammable. Keep away from heat and open flame. Do not apply this product around electrical equipment due to the possibility of shock hazard."

Directions for Use section comment(s):

8. Delete all text in the introduction to the Directions for Use section immediately following the statement "It is a violation of ..." that has been marked with "~~strikethrough~~" and replace with:

READ ENTIRE LABEL BEFORE EACH USE. USE ONLY IN A WELL VENTILATED AREA. USE ONLY ON DOGS, PUPPIES, CATS AND KITENS (OVER 12 WEEKS OLD) AND HORSES.²

Read and follow all directions and precautions on this product label.³

<p style="text-align: center;">General Precautions and Use Restrictions</p> <ul style="list-style-type: none"> • Apply this product only as specified on this label. • DO NOT apply this product around electrical equipment due to the possibility of shock hazard. • Except when applying directly to pets, DO NOT allow adults, children or pets to enter treated area until sprays have dried. • Remove pets, birds and cover fish aquariums before spraying. • DO NOT apply to pets less than 12 weeks old. • Avoid spraying of genital areas. • DO NOT use on horses or foals intended for slaughter. • Consult a veterinarian before applying this product on debilitated, aged, pregnant or nursing animals. Certain medications can interact with pesticides. Consult a veterinarian before using on medicated animals. • Sensitivities may occur after using ANY pesticide 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.
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¹ Please note that the "1-800-xxx-xxxx" number listed must be available twenty-four (24) hours per day, seven (7) days per week for answering and responding to any medical emergencies or health concerns.

² For more detailed information on labeling claims permitted by the Agency, please refer to PR Notice 96-6.

³ This new General Precautions and Use Restrictions section is required by the Reregistration Eligibility Decision documents (REDs) for pyrethrins, piperonyl butoxide and MGK[®] 264 and replaces existing text deleted from various areas of the label.

Directions for Use, Cats and Dogs subsection comment(s):

- 9. Replace this subsection with: "**Dogs and Cats:** Cover animal's eyes with hand and with a firm fast stroke, to get 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 hindquarters, finishing with legs last and paying special attention to the footpads (between the toes) and underbody areas. Avoid spraying of genital areas. For best penetration of spray to the skin, direct spray against the lay of the hair. On long-haired dogs, rub your hand against the lay of the hair, spraying the ruffed hair directly behind the hand. Make sure spray thoroughly wets ticks. Follow application with a complete brushing of the animal's hair to remove dead insects. Reapply treatment as necessary, but do not treat more than once per week."

Directions for Use, Puppies and Kittens subsection comment(s):

- 10. Replace this subsection with: "**Puppies and Kittens: Do not use on puppies or kittens under 12 weeks old.** Treat same as for dogs and cats, except nursing puppies and kittens. Spray only along back or on your finger tips and rub in with your hands. Follow application with a complete brushing of the animal's hair to remove dead insects."

Directions for Use, Pet Sleeping Quarters subsection comment(s):

- 11. Replace this subsection with: "**Pet Sleeping Quarters:** For use in companion animal quarters only. Do not broadcast outdoors. Remove animals from quarters before treating premises. Spray around baseboards, windows, door frames, wall cracks and local areas of floors. If mosquitoes, gnats or lice are present, spray lightly into the air. Follow application with a complete brushing of the animal's hair to remove dead insects. Reapply treatment as necessary, but do not treat more than once per week. The bedding should be sprayed and then replaced with fresh bedding for best results. Allow all surfaces treated to dry before allowing pets to reoccupy."

Directions for Use, Horses subsection comment(s):

- 12. Replace this subsection with: "**Horses:** To control stable flies, horse flies, deer flies and other face flies, apply to face, legs, flanks, top line and other body areas commonly attacked by these flies. Reapply treatment as necessary, but do not treat more than once per week."

Storage and Disposal section comment(s):

- 13. Replace the existing section with the following:

Storage and Disposal

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

Pesticide Storage: Store this product only in original container in a cool, dry area that is inaccessible to pets and children.

Pesticide Disposal: If empty: Do not reuse this container. Place in trash or offer for recycling, if available. **If partly filled:** Call your solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

Ritter Chemical Company should note that a notice of availability of EPA's RED for products containing pyrethrins was published in the *Federal Register* on July 26, 2006 (Volume 71, Number 143, Pages 42387-42389). In addition, EPA's RED for products containing piperonyl butoxide was published in the *Federal Register* on July 26, 2006 (Volume 71, Number 143, Pages 42385-42386). Further, EPA's RED for products containing MGK[®] 264 was published in the *Federal Register* on July 26, 2006 (Volume 71, Number 143, Pages 42381-42383). As a result, additional data and/or labeling changes may be required for products containing pyrethrins, piperonyl butoxide and MGK[®] 264.

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Please submit two (2) copies of the final printed labeling, incorporating the above changes, before releasing the product for shipment. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product bearing amended labeling constitutes accepting of these conditions. A stamped copy of the label for this product is enclosed for your records. If you have any questions, please contact Mr. Carmen Rodia at (703) 306-0327 or via e-mail at Rodia.Carmen@epa.gov.

Sincerely yours,



Richard J. Gebken,
Product Manager (10)
Insecticide Branch,
Registration Division (7505P)

Enclosure

009468-00031 D386553

Text Label without graphics, pictures and illustrations

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 isocinchomeronate).....	0.50%
**Other Ingredients:	97.35%
Total:	100.00%

*Equivalent to 1.2% (butylcarbityl) (6-propylpiperonyl) ester and 0.3% related compounds

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

WARNING Keep Out of Reach of Children

See side panel for additional Precautionary Statements

EPA Reg. No.: 9468-31
EPA Est. No.: 47258-TX-01

Net Contents: 16 FL. OZ. (473 ml)

Manufactured for:
Ritter Chemical Company
P. O. Box 430974
Houston, TX 77243

ACCEPTED
with COMMENTS
In EPA Letter Dated
January 17, 2008
Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
9468-31

READ ENTIRE LABEL BEFORE EACH USE

FIRST AID	
If swallowed	<ul style="list-style-type: none"> • Call poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
If inhaled	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. • Call a poison control center or doctor for further treatment advice.
If in eyes	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15 – 20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
If on skin or clothing	<p>If you suspect a reaction to this product:</p> <ul style="list-style-type: none"> • Discontinue use. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
<p>Have the product container or label with you when calling a poison control center or doctor, or going for treatment. Ritter's Flea & Tick Spray, EPA Reg. No. 9468-31. You may also contact CHEMTREC at 1-800-424-9300 for emergency treatment information.</p>	

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals.

~~**WARNING: NOT TO BE USED ON ANIMALS TO BE USED AS A SOURCE OF FOOD OR FEED**~~

~~**HUMANS:** Harmful if swallowed or inhaled. Avoid breathing spray mist. 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.~~

~~Consult a veterinarian before using this product on debilitated, aged, pregnant or nursing 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.~~

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not apply directly to water, or to areas where surface water is or present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters or rinsate.

PHYSICAL OR CHEMICAL HAZARDS

Flammable. Keep away from heat or open flame. Do not use this product in or on electrical equipment due to possibility of shock hazard.

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 around electrical equipment due to possibility of shock hazard.~~
- ~~USE ONLY IN A WELL VENTILATED AREA. Remove birds and cover aquariums before spraying. Remove safety cap and insert sprayer.~~
- ~~Do not use on horses or foals intended for slaughter.~~
- ~~Do not apply over cuts, wounds, or irritated skin.~~
- ~~Do not apply near eyes and mouth. Apply sparingly around ears.~~

Cats and Dogs: Cover animal's eyes with hand and with a firm fast stroke, to get 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 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:

Do Not Use On Puppies or Kittens Under 12 Weeks.

Treat same as cats and dogs except nursing puppies and kittens, spray only along back or on your finger tips and rub in with your finger tips.

Pet Sleeping Quarters:

For use in companion animal quarters only, do not broadcast outdoors. Remove animals from quarters before treating premises.

Spray around baseboards, windows, door frames, wall cracks and local areas of floors. If mosquitoes, gnats, or lice 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 other face flies apply to face, legs, flanks, top line and other body areas commonly attacked by these flies. Repeat treatment as needed.

Storage and Disposal

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

Pesticide Storage: Store this product in the original container, in a cool place, away from children and pets.

Pesticide Disposal: If empty: Do not reuse this container. Place in trash or offer for recycling if available

If partly filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.