



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

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OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

AUG 09 1994

Daniel R. Freeman
25 Kevin Lee Lane
Rancho Mirage, CA 92270

Attention: Mr. Daniel Freeman

Subject: Repels Plus Dog and Cat Repellent
EPA Registration No. 20215-6
Mr. Yeager's Letter of August 8, 1994

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable provided that you make the following changes:

1. Change "Do Not Store in the House" to "Store in Garage or Outbuilding Only".

The reason for this change is to make this text consistent with your "Storage and Disposal" statement and to avoid the contradiction of **prohibiting** storage in the house on the Front Panel but **recommending** storage in a garage in the same home on the Right Panel.

2. On the Front Panel, change the first paragraph to read:

Repels Plus is used to reduce the frequency of defecation or urination by dogs on lawns, around hedges, trees, shrubs and vines and to reduce the frequency of digging by cats in flower gardens, lawns, and under bushes.

We requested this change in the August 4, 1994, Notice of Registration.

3. Revise your ingredient statement as follows:

Active Ingredients:	%
Thiram (Tetramethylthiuramdisulfide)	6.25
Methyl Nonyl Ketone (2-Undecanone)	6.25
Castor Oil (USP)	5.50
Inert Ingredients:	<u>82.00</u>
Total	100.00

As indicated in 40 CFR 156.10(g)(3), if a common name has been established for a pesticide, you will need to use that name followed by the chemical name in your ingredient statement. This is true for the actives, Thiram and Methyl Nonyl Ketone. If a common name is well known, you can use just that name. This is true for Castor Oil.

4. On your Right Panel under WARNING, make the third sentence (Causes substantial but temporary eye injury.) the **first** sentence, as had been requested in our January 19, 1994, letter.
5. Under "Storage and Disposal", revise your "Storage" section as follows:

Storage: Store only in original container in a dry place of a garage or outbuilding inaccessible to children and pets. Reclose partially emptied container and seal it in a plastic bag with a twist-tie.

These changes will make this text of your label consistent with that at the top of your Front Panel and resolve any concerns about odors from opened product.

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 the amended labeling constitutes acceptance of these conditions.

A stamped copy of the labeling is enclosed for your records.

Sincerely yours,

RAF

Robert A. Forrest
Product Manager (14)
Insecticide-Rodenticide Branch
Registration Division (H7504C)

Enclosures: 1. Stamped label
2. A-79 Enclosure

cc. 1. Registration Consulting Ass.
Att. Charles Yeager
FAX 916-268-2044
2. Cunningham and Ass.
Mark Byrum
FAX 9-548-5220

Peacock WP#5:A:20215-6.AMD:305-5407, 6600:8/9/94

TO :
FROM :

PHONE NO. : 95005113725957033056596

AUG. 8. 1994 10:43AM P. 2

ACCEPTED
with COMMENTS
in EPA Letter Dated

AUG 09 1994

Under the
Fungicide
in accordance
registered
20215-6

Frnt Panel

REPEL PLUS
DOG AND CAT REPELLENT

For Outdoor Use Only
Do Not Store in the House

Repels Plus is used to reduce the frequency of or prevent defecation or urination by dogs on Lawns, or around Hedges, Trees, Shrubs, and Vines, and to reduce the frequency of digging by cats in Flower and Vegetable Gardens, Lawns, and under Bushes.

Easy to Apply Directly from the Container

Active Ingredients:	%
Thiram-tetramethylthiuram disulfide	6.25
2-Undecanone	6.25
Castor Oil (USP)	5.50
Inert Ingredients:	<u>82.00</u>
Total	100.00

(16 pt.)

WARNING

(12 pt.)

Keep Out of Reach of Children

See Other Cautions on Side Panels

EPA Reg. No. 20215-6
EPA Est. No.

Will Treat 110 to 220 sq. ft.

Net Weight: 2 lbs. (0.907 kg)

Daniel R. Freeman
25 Kevin Lee Lane
Rancho Mirage, CA 92270

BEST AVAILABLE COPY

Left Panel

DIRECTIONS FOR USE

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

Use Restrictions

This product may be used to reduce the frequency of defecation or urination by dogs on lawns, around hedges, trees, shrubs, and vines. This product also may be used to limit digging by cats in flower gardens, lawns, and under bushes. Do not use this product indoors.

This material may not be used in vegetable gardens or in any areas where food or feed crops are grown. Do not apply this product directly on flowers, foliage, or other portions of any plants other than lawn grasses and weeds. Do not apply to Dichondra or other unusual ground covers.

Application Directions

Open container and flip out pouring spout. When applying product, hold opened container at arm's length, down and away from the body.

Dogs: Remove all fecal material present in area to be treated. Sprinkle REPELS PLUS evenly over the area to be protected at a rate of one pound of product per 110 square feet (e.g., a 10-ft. 11-ft. rectangle). Do not place product in piles. Re-treat at least once per week until defecating and/or urinating no longer occurs in the treated area or it becomes evident that the product is not working. If product becomes compacted, break it apart with a stick or screwdriver.

Cats: Sprinkle REPEL PLUS on the affected area at a rate of one pound of product per 55 square feet (e.g., a 7-ft. by 8-ft. rectangle). Re-treat at least once per week until digging stops or it becomes evident that the product is not working. If product becomes compacted, break it apart with a stick or screwdriver.

Money Back Guarantee

Satisfaction guaranteed or mail front of carton and sales slip to manufacturer for full cash refund. Please send self-addressed envelope.

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Right Panel

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING

Do not get in eyes, on skin, or on clothing. Wear safety glasses. Causes substantial but temporary eye injury. Harmful if absorbed through skin. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

STATEMENT OF PRACTICAL TREATMENT

IF IN EYES: Hold eyelids open and flush with a steady gentle stream of water for 15 minutes.

IF SWALLOWED: Drink promptly a large quantity of milk, egg whites, gelatin solution or, if these are not available, large quantities of water. Avoid alcohol. Get medical attention.

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

ENVIRONMENTAL HAZARDS

Do not apply directly to water.

Storage and Disposal

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

Storage: Store only in original container. Reclose partially emptied container and store in a dry place in a garage or out building inaccessible to children and pets.

Disposal: Do not reuse empty container. Securely wrap in newspaper and discard in trash.

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