

PM19

28293-16

184

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AUG 13 1990

Mr. Barry J. Santerre
Unicorn Laboratories
1000 118th Avenue North
St. Petersburg, Florida 33716

Dear Mr. Santerre:

Subject: Revised labeling and Confidential Statement
of Formula (CSF) Removing R-11
Unicorn Flea and Tick Spray
EPA Reg. No. 28293-16
Your submission of June 18, 1990

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. The revised CSF indicating deletion of R-11 is acceptable with the following comments:

1. Submit the product specific product chemistry and the data matrix for this revised formulation. Since this is considered a new product, so new product chemistry data are required.
2. Provide the chemical identity, CAS Numbers, and percentages of all components, and the Material Safety Data Sheets for D & O 40 R8122. Your supplier may contact us directly referencing your EPA Registration Number in their response. For perfumes and flavorings, provide for each component in the mixture : the chemical name, CAS Registry Number, and the percentage or range in percentage in the mixture. Certify that flavors are nonfood type. The confidential information submitted by the suppliers is kept confidential under FIFRA section 10.
3. Provide flash point of the product with propellant or list the product as Extremely Flammable under the heading PHYSICAL OR CHEMICAL HAZARDS.
4. The flash point reported in the CSF exceeds the one expected for this product. Please check and resubmit. Mixtures marketed under pressure, including those containing hydrocarbons, are subject in their entirety to tests indicated in 40 CFR

Section 156.10(h)(2)(iii) of the maxipackage. Note that flash points for pressurized liquids are conveniently measured after collecting the expelled liquid from the container in an open cup chilled with dry ice (Refer to Aerosol Guide, CSMA).

5. Specify a container size on the label. On your amendment application you have specified container sizes of upto 55 gallons. Revise that to more realistic pressurized container sizes.

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

Submit five copoes of revised labeling before you release the product for shipment.

Sincerely yours,

Dennis H. Edwards, Jr.
Product Manager (12)
Insecticide Rodenticide Branch
Registration Division (H7505C)

284

ACCEPTED
with COMMENTS
in EPA Letter Dated:

AUG 13 1990

UNICORN

FLEA AND TICK SPRAY

**Kills Fleas & Ticks on Dogs
Repels Flies, Mosquitoes and Gnats
Lanolinizes Animals Coat**

Under the authority of the
Federal Insecticide, Fungicide,
and Rodenticide Act (FIFRA),
EPA Reg. No. 28293-16

ACTIVE INGREDIENTS:

1-Naphthyl-N-Methylcarbamate.....	0.50%
Pyrethrin.....	0.06%
Piperonyl Butoxide, Technical*.....	0.12%
N-octyl bicycloheptene dicarboximide.....	0.20%

INERT INGREDIENTS:.....	<u>99.12%</u>
	100.00%

* Consists of 0.094% (Butylcarbityl) (6-Propyl piperonyl) ether and 0.024% related compounds.

Keep Out of Reach of Children

CAUTION

See Back Panel for Additional Cautions

MANUFACTURED BY:

**Unicorn Laboratories
1000 118th Avenue North
St. Petersburg, Florida 33716**

EPA REG. NO. 28293-16

EPA EST. NO. 28293-FL-1

11. 4

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Harmful if swallowed, inhaled or absorbed through skin. Avoid contact with skin and eyes. Wash hands with soap and water after using or handling. Do not use on cats or puppies less than four weeks of age. Keep out of reach of children. ✓

Notice to Physician: Carbaryl is a moderate reversible cholinesterase inhibitor. Atropine Sulfate is antidotal.

STATEMENT OF PRACTICAL TREATMENT

IF INHALED: Remove victim to fresh air. Apply artificial respiration in indicated.

IN ON SKIN: Remove contaminated clothing and wash affected areas with soap and water. ✓

IF IN EYES: Flush eyes with plenty of water. Get medical attention if irritation persists.

PHYSICAL OR CHEMICAL HAZARD

FLAMMABLE. Contents under pressure. Do not use near fire, sparks or flame. Do not puncture or incinerate. Exposure to temperatures above 130°F may cause bursting. ✓

DIRECTIONS FOR USE

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

Remove cap and press down button with hole away from you. Hold container approximately 6 inches from animal. Work from rear of animal towards the head, fluffing the hair to permit the spray to penetrate to the skin. Spray only enough to slightly dampen the hair and skin. Wet ticks with the spray. Do not get spray in eyes or on scrotum. ✓

Use spray on the basis of 4 to 6 seconds for a 5 pound cat and 20 to 30 seconds for a 25 pound dog. Repeat treatment if necessary; but not more than once a week. (The hissing sound and the cool sensation caused by the spray may temporarily frighten nervous pets; however, they are expected to become accustomed to the treatment.) Treat bedding, interior of kennels and other places where ticks and fleas congregate to help prevent reinfestation.

STORAGE AND DISPOSAL

Store in original container in cool, locked storage area.

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