

APR 12 2005

Adams Technology Systems
5145 Forest Run Trace - Suite B
Alpharetta GA 30022-4504

Dear Ms. Hartis:

Subject: Label Revisions

Product Name: Cardinal Flea & Tick Spray for
Dogs, Cats, & Horses

EPA Registration No. 29909-8

Application date: November 18, 2004

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, is acceptable, subject to the comments listed below:

- 1) In the ingredient statement the (total) must be aligned to the left margin.
- 2) The Hazard to Humans and Domestic Animals statement should be in all "CAPS".
- 3) You must remove the following statement [Following not required for non-sprayer package] and [not required on container less than five gallons]. [Header not required on container less than 5 gallons].
- 4) Revise the statement to read: Remove pets, birds, and cover fish aquariums before spraying.


Enclosed is a copy of your label stamped "Accepted with Comments". Submit four (4) copies of the final labeling before you release the product for shipment.

Pg 2 EPA Reg no. 29909-8

To expedite handling, please return a copy of this letter with your response and final printed labeling for review.

If you have any questions regarding this letter, you may contact Ms. Pat Quarles @ (703) 305-6876.

Sincerely,



Richard Gebken
Product Manager 10
Insecticide Branch
Registration Division 7505

enclosure

Cardinal Flea & Tick Spray for Dogs, Cats & Horses

- Herbal and Botanical
- For Use on Dogs, Cats & Horses
- To Control Fleas, Ticks, and Ear Mites
- Ear Mite & Tick Control
- Water Base – Non-Oily

ACTIVE INGREDIENTS:

Pyrethrins	0.06%
*Piperonyl Butoxide Technical	0.60%
OTHER INGREDIENTS:	99.34%
TOTAL:	100.00%

*Equivalent to 0.48% (butylcarbityl (6-propylpiperonyl) ether and to 0.12% related compounds.

**KEEP OUT OF REACH OF CHILDREN
CAUTION
See Back Panel for Precautionary Statements**

**Manufactured by:
Cardinal Laboratories, Inc.
710 S. Ayon Avenue
Azusa, CA 91702
1-800-433-7387**

EPA Reg. No. 29909-8

EPA Est. No. 29909-CA-1

Net Contents: 4 oz. (118 ml) [or alternate size]

**ACCEPTED
with COMMENTS
In EPA Letter Dated:
APR 12 2005**

Under the Federal Insecticide, Fungicide, and Rodenticide Act, this pesticide is registered under the following registration number:
29909-8

FIRST AID

Call a poison control center or doctor for treatment advice. Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-xxx-xxxx for emergency medical treatment information.

[Toll free phone number language may be modified to fit company's policy. Suggestions follow:]

[National Pesticide Information Center (NPIC) - 1-800-858-7378]

[American Association of Poison Control Centers - 1-800-222-1222]

[Animal Poison Control Center (APCC) - 1-888-426-4435]

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.
If swallowed	<ul style="list-style-type: none"> •Call a 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 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.
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.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION

JMAN: Harmful if swallowed, absorbed through the skin, or inhaled. Avoid contact with skin, eyes or clothing. Avoid breathing vapor or spray mist. Causes moderate eye irritation. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse.

ANIMALS: Do not use on animals under 12 weeks of age. 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 pet shampoo and rinse with large amounts of water. If signs continue, consult a veterinarian immediately. *[Following Not required for non-sprayer packaging]* Remove birds and cover fish aquariums before spraying.

[Not required on containers less than five gallons]

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Keep out of lakes, streams, ponds, tidal marshes and estuaries. Do not wash animal where runoff is likely to occur.

Buyer assumes all risks of use, storage or handling of this material not in strict accordance with directions given herewith.

DIRECTIONS FOR USE

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

READ ENTIRE LABEL BEFORE EACH USE. SHAKE WELL BEFORE USE**FOR USE ON DOGS AND CATS**

Hold bottle upright and point nozzle opening in desired direction of spray. Spray the animal from a distance of 3 – 12 inches.

Start spraying at the head, moving the dispenser rapidly and making sure that the animal's entire body is covered, including the legs and under body. While spraying fluff the hair so that spray will penetrate to the skin. Make sure spray wets thoroughly. Do not spray near eyes or on face. Repeat daily until fleas and ticks are eliminated.

FOR USE ON HORSES

Spray from a distance of 3 – 12 inches. Make sure spray wets thoroughly the area commonly attached by fleas and ticks. Do not spray into the eyes. Repeat daily until fleas & ticks are eliminated.

Ear Mite & Tick Control

To be used as an aid in eliminating mites and ticks in the ears of cats and dogs and for relief from itching caused by such conditions. Apply 5 drops into the ears twice daily until ticks and mites are eliminated. Do not allow children to apply this product. Use other EPA approved products for treatment of mites and ticks outside the ear.

STORAGE AND DISPOSAL *[Header not required on containers less than 5 gallons]*

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

Disposal:

empty: Place in trash or offer for recycling, if available.

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.