

APR 11 1990

Adams Veterinary Research Laboratories, Inc
Subsidiary of Morden Laboratories
P.O. Box 971039
Miami, FL 33197

Dear Dr. Alan R. Wagner

Subject: Adams 14 Day Residual Flea And Tick Mist
EPA Reg. No. 37425-16
Application dated March 8, 1990

The proposed amendment to the registration of the product cited above under the Federal Insecticide Fungicide and Rodenticide Act removing the active ingredient, MGK R-11, is acceptable subject to the comments listed below. A stamped copy of the draft label is enclosed for your records.

- 1) Based on the current Confidential Statement of Formula (CSF) dated March 8, 1990 the product will not meet the label claim for the active ingredients. The percentage claimed in the ingredient statement for the active ingredients must be the same as the certified lower limit for these ingredients listed in the CSF. A new CSF which agrees with the label declaration must be submitted or the label ingredients statement must be changed to agree with the current CSF.
- 2) This change in formulation is only acceptable as a basis formulation change not as an alternate formula. Submit a new CSF with the proper block checked.
- 3) Provide the upper and lower Certified Limits of the individually added inerts in the CSF.
- 4) Submit the product chemistry data for the new formulation including the flash point of the product.

55893:I:Tavano:CBI-13:KENCO:04/04/90:05/04/90:ka:sw:vo:dd:ka

CONCURRENCES							
SYMBOL	H7505C						
SURNAME	Tavano						
DATE	4/9/90						

- 5) Submit a 1 year storage stability study. The formulated product must be analyzed for its active ingredients at time zero and for one year of storage. The storage must be under warehouse conditions of temperature and humidity using containers similar to those which will be used in the trade. This study must be submitted within 15 months of the date of this letter.
- 6) Provide the chemical identity of the ingredients listed below. Include Chemical Abstracts Numbers and Manufacturing Safety Data Sheets.
 - a) [REDACTED]
 - b) [REDACTED]
- 7) Provide the chemical identity and percentages of all components of the ingredients listed below. Include Chemical Abstracts Numbers for each component and a Manufacturing Safety Data Sheet.
 - a) [REDACTED]
 - b) [REDACTED]

Sincerely yours,



Phil Hutton
Product Manager (17)
Insecticide-Rodenticide Branch
Registration Division (H7505C)

A^o ADAMSTM 14 DAY RESIDUAL FLEA AND TICK MIST A

PRECAUTIONARY STATEMENTS Hazards to Humans and Domestic Animals **WARNING**

Use Only in a Well Ventilated Area

HUMAN: Harmful if swallowed or inhaled. Avoid breathing mist. Avoid contamination of food. Wash hands with soap and water after using. May cause eye injury. Wear safety glasses or other protective eye wear.

ANIMAL: Avoid treatment of nursing kittens and puppies. If treatment is necessary follow special instructions. Do not oversaturate, especially on cats. Avoid spraying of genital areas.

ENVIRONMENTAL HAZARDS: This product is toxic to fish. Do not add directly to water. Do not apply where runoff is likely to occur.

PHYSICAL OR CHEMICAL HAZARDS: FLAMMABLE. Keep away from heat and open flame. Contains alcohol. Do not apply to painted or finished wood surfaces.

STATEMENT OF PRACTICAL TREATMENT

IF IN EYES: Flush with plenty of water. Contact a physician immediately.
IF ON SKIN: Wash with soap and water. Get medical attention if irritation persists.

IF SWALLOWED: Call a physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person.

DIRECTIONS FOR USE

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

GENERAL USE

DOGS AND CATS

Remove safety cap and insert sprayer. Cover animal's eyes with hand and with a firm, fast stroke to get a proper spray mist, spray head, ears and chest.

INSECTICIDE, REPELLENT & DEODORANT FOR DOGS - PUPPIES - CATS - KITTENS

KILLS

FLEAS - LICE - TICKS

TEMPORARILY REPELS GNATS - FLIES - MOSQUITOES

ACTIVE INGREDIENTS.

Pyrethrins	0.15%
*Piperonyl butoxide, technical	0.37%
N-Octyl bicycloheptene dicarboximide	1.00%

Di-n-propyl isocinchomeronate	1.00%
**INERT INGREDIENTS	97.48%

TOTAL 100.00%

*Equivalent to 0.296% of butylcarbityl (8-propylpiperonyl) ether and 0.074% of related compounds.

**Inert ingredients include grooming additives to ease combing and brushing of the coat to remove dead fleas, ticks and lice.

KEEP OUT OF REACH OF CHILDREN

WARNING

See Side Panel for Precautionary Statements

EPA Est. No. 37425-FL-1 EPA Reg. No. 37425-18

Net Contents 16 fl. oz./473 ml

Directions For Use (continued)

until damp. With fingertips, rub into face around spray neck, middle and hindquarters, finishing of spray to the skin, direct spray against the hair of dogs, rub your hand against the leg of hair directly behind the hand. Make sure spraying on reinfestation levels in the pet's environment. Repeat actions of up to 14 days have been. DAY RESIDUAL FLEA AND TICK MIST. cor. Repeat treatment as needed.

PUPPIES AND KITTENS

Spray only along animal's back, or on your animal's fur.

PET'S ENVIRONMENT

For comprehensive control of fleas and ticks, eggs and larvae which occur both indoors and outdoors, we recommend the use of Adams Surface Spray on all flooring, carpets and bedding. Outdoor areas such as patios, lawns, porches, be treated similarly with ADAMS SURFACE SPRAY.

STORAGE AND DISPOSAL

STORAGE: Store in a cool, dry area away from children. Do not contaminate water, food or feed by transfer contents to other containers.

DISPOSAL: Do not reuse container. Rinse in several layers of newspaper and discard.

Sold Only Through Licensed Dealers

*U.S. Patent No. 4,668,666

ADAMS Veterinary-Strength ProductsTM
ADAMS VETERINARY RESEARCH LABORATORIES, INC.
Subsidiary of Norden Laboratories, Miami, FL 33197, U.S.A.

BEST AVAILABLE COPY

ACCEPTED
with COMMENTS
in EPA Letter Dated:

APR - 9 1990

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide
registered under EPA Reg. No.

37425-16

