

APR 11 1990

PM17
27425-19
Pg 2 of 3

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

Dear Dr. Alan R. Wagner

Subject: Adams Pyrethrin Dip
EPA Reg. No. 37425-19
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 basic 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]
 - c) [REDACTED]
- 7) Provide the chemical identity and percentages of all components of the ingredient, C-5. Include Chemical abstracts Numbers for each component and a Manufacturing Safety Data Sheet.

Sincerely yours,



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

A[®] ADAMSTM PYRETHRIN DIP A

PRECAUTIONARY STATEMENTS
Hazards to Humans and Domestic Animals

CAUTION

HUMAN: Harmful if swallowed or inhaled. Avoid contamination of food. Wash hands with soap and water after using.

ANIMAL: Do not use on puppies, kittens or foals less than 8 weeks of age unless prescribed by a veterinarian.

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

DIRECTIONS FOR USE

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

DOGS AND CATS: To kill fleas, ticks and lice thoroughly mix a half ounce (1 tablespoon) of ADAMS PYRETHRIN DIP with 1 gallon of warm water. For outdoor animals in areas of severe infestations a half ounce (1 tablespoon) per quart may be used. Do not dilute more than will be used in a 24 hour period.

SHAKE WELL BEFORE USE

If animal's coat is very dirty, bathe first with ADAMS FLEA AND TICK SHAMPOO or ADAMS TEARLESS

**With Aloe Vera Extract,
Lanolin and Sunscreens
For DOGS - CATS - HORSES
KILLS - REPELS
FLEAS - TICKS - LICE
Gnats - Mosquitoes - Flies**

ACTIVE INGREDIENTS:

Pyrethrins 0.97%
*Piperonyl butoxide, technical 3.74%
N-Octyl bicycloheptene dicarboximide . 5.70%

Di-n-propyl isocinchomeronate 1.94%
INERT INGREDIENTS..... 87.65%
TOTAL 100.00%

*Equivalent to 2.992% of butylcarbityl (8-propylpiperonyl) ether and 0.748% of related compounds.

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

See Side Panel for Precautionary Statements

EPA Est. No. 37425-FL-1

EPA Reg. No. 37425-19

Net Contents 4 fl. oz./118 ml

Directions For Use (continued):
SHAMPOO: Dip should be applied to wet coat. Sponge, dip or spray and ADAMS PYRETHRIN DIP making sure soaked to the skin. Let dip dry on animal. **RINSE OFF!**

HORSES: Dilute and apply as directed on cats.

Dependent on reinfestation levels in environment, extended insecticide and has been demonstrated with ADAMS DIP.* Use as directed by your veterinarian as necessary without interval restriction of dipping.

STORAGE AND DISPOSAL

STORAGE: Store in a cool, dry area and open flame. Do not contaminate food by storage or disposal. Do not transfer to other containers.

DISPOSAL: Do not reuse container. Thoroughly and wrap container in newspaper and discard in trash.

Sold Only Through Licensed Veterinarians

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

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

ACCEPTED
with COMMENTS
in EPA Letter Dated:

APR 1 1979

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

37425-19