



ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

February 2, 2004

April Hawkes
Enforcer Products
Specialty Products Group, Inc.
P.O. Box 1060
Cartersville, GA 30120-1060

Subject: Amendment- Resubmission for PR Notice 2001-1 & 2001-6
Enforcer Flea & Tick Spray For Pets II
EPA Reg. No. 40849-34
Your submission dated August 29, 2003

Dear Ms. Hawkes:

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. Two (2) copies of the finished labeling must be submitted prior to releasing the product for shipment. A stamped copy of the label is enclosed for your records.

1. Revise Precautionary Statement as follows:

"Harmful if inhaled or absorbed through skin. Avoid breathing spray mist. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse."

2. Delete "Spray only on back and rub in well with fingertips" as requested in our June 25, 2003 letter or request user to use waterproof gloves.

3. Under Horses and Ponies either delete "Repeat application as necessary" or indicate the repeat interval which should be based upon the residual effectiveness of the product.

If you have any questions regarding this action, please contact BeWanda Alexander of my team at (703) 305-7460.

Sincerely,



George T. LaRocca
Product Manager (13)
Insecticide Branch
Registration Division (7505C)

ENFORCER® FLEA & TICK SPRAY FOR PETS II

Breaks Flea Life Cycle

Repels Fleas and Tick on Dogs [and Cats]

Residually Kills Fleas for up to 2 Weeks
and Ticks for up to 1 Week on Dogs [and Cats]

Repels and Kills Biting Flies and Mosquitoes on Horses and Ponies

ACTIVE INGREDIENTS:

Pyrethrins	0.020%
Piperonyl Butoxide, Technical	0.400%
Permethrin	0.100%
Related Compounds	0.008%

OTHER INGREDIENTS 99.292%

Total 100.000%

*Equivalent to 0.32% (butylcarbityl) (6 proylpiperonyl) ether and 0.08% related compounds

**cis/trans isomer ration: Min. 35% (±) cis,max. 65% (±) trans.

Keep Out of Reach of Children
CAUTION
See back panel for additional precautionary statements.

Net Contents ___ Fl. Oz. / ___ mL)

{Back Panel}

**READ ENTIRE LABEL BEFORE EACH USE.
USE ONLY ON DOGS [OR CATS]!**

ACCEPTED
with COMMENTS
in EPA Letter Dated
FEB 2 2004
Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
40849-34

DIRECTIONS FOR USE

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

Hold container upright. Shake well before using.

This product will kill fleas up to 14 days and ticks up to 7 days on dogs and cats.

Dogs [and Cats]: Spray the animal from a distance of 8-12 inches. Start spraying at the tail, moving the dispenser rapidly and making sure the animal's entire body is covered, including the legs and underbody . Fluff the hair as you spray so the spray will penetrate to the skin. Thoroughly wet ticks . Do not spray in face, eyes, ears or on genitalia. Do not reapply product for 7 days. [For cats apply at the rate of 1 second per pound of body weight.] For dogs apply at the rate of 2 seconds per pound of body weight for thin or short-haired dogs and up to 4 seconds per pound of body weight for heavy or long-haired dogs. Sensitivities may occur after using ANY pesticide product for pets. If signs of sensitivity occur, bathe your pet with mild soap and rinse with large amounts of water. If signs continue, immediately consult a veterinarian.

Puppies [and Kittens]: Spray only on back and rub in well with fingertips. . Do not use on puppies or kittens under 12 weeks of age.

Consult a veterinarian before using this product on debilitated, aged, medicated, pregnant or nursing animals .

Pet Sleeping Quarters: Remove old pet bedding and wash . Thoroughly spray area and replace with new bedding that has been sprayed. Do not allow pets to reoccupy the area until spray has dried.

Horses and Ponies: Spray the animal from a distance of 8-12 inches giving special attention to facial areas, shoulders, neck, back, shanks and other areas of animal where insects are most often seen. Avoid contact with animal's eyes and nostrils. Moisten hair but do not completely wet skin. Repeat application as necessary.

Storage and Disposal

Storage: Store in a cool, dry (preferably locked) storage area inaccessible to children and pets and away from heat and sunlight. Protect from freezing (32°F/0°C). **Disposal:** If Empty: Do not puncture or incinerate. Place in trash or offer for recycling if available. If Partly Filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions...

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

CAUTION: Humans: Harmful if inhaled. Avoid breathing vapors. Avoid contact with skin or clothing. **Animals:** Do not use on puppies or kittens under 12 weeks of age. Sensitivities may occur after using ANY pesticide product for pets. If signs of sensitivity occur, bathe your pet with mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately.

First Aid

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. • Call a poison control center or doctor for further treatment advice.
If on Skin or Clothing	<ul style="list-style-type: none"> • Take off contaminated clothing. • Immediately rinse skin with plenty of water for 15-20 minutes. • 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.]	

{Note: The First Aid statements' grid format will be used if market label space permits; otherwise a paragraph format will be used.}

In the event of an animal-related emergency, call the National Animal Poison Control Center at 1-800- 345-4735.

EPA Reg. No. 40849-34 EPA Est. _____

Copy _____ Made in U.S.A. Product Code: _____

Manufactured [Distributed] By

Enforcer Products

A division of Acuity Specialty Products Group, Inc.

P.O. Box 1060

Cartersville, GA 30120

Questions? Call (xxx) xxx-xxxx, Monday through Friday, 9am – 5pm EST.

[www.[url].com]