

MAY 8 1991

ARC Laboratories  
c/o Ms. Kim Davis  
RegWest Company  
P.O. Box 2220  
Greeley, CO 80632-2220

Gentlemen:

Subject: Label Amendments  
Flea & Tick Killer  
EPA Registration No. 44126-1  
Your Submissions Dated November 22, 1989, July 30 and  
December 20, 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. Five copies of the finished labeling must be submitted prior to releasing the product for shipment.

- Delete the front panel claim "Contains a Natural Organic Insecticide." This is not a true statement for this pesticide.

Identify the composition of the Drying Ear Creme and submit a description of the Ear Cleaner for the record.

Sincerely yours,

*RFM*  
Richard P. Mountfort  
Product Manager (10)  
Insecticide-Rodenticide Branch  
Registration Division (R7505C)

62492;I.A-27;Mountfort;L10-6;KEVRIC;05/02/91;05/29/91;CL;wo;av  
CONCURRENCES

SYMBOL							
SURNAME							
DATE							

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**ARC LABORATORIES  
FLEA & TICK KILLER**

**Spray For Dogs & Cats,  
Puppies & Kittens Over 4 Weeks of Age  
and for use on  
Pet Bedding and Carpets**

**For the Control of Fleas,  
Ticks, Ear Mites and Lice**

**ACCEPTED  
with COMMENTS  
in EPA Letter Dated  
MAY 8 1991**

**Controls Ear Mites and Ear Ticks**

**Contains a Natural Organic Insecticide**

**Under the Federal Insecticide,  
Fungicide, and Rodenticide Act  
as amended, for the pesticide  
registered under EPA Reg. No.  
44126-1**

**ACTIVE INGREDIENTS:**

Pyrethrins .....	0.15%
*Piperonyl Butoxide, Technical .....	1.50%
<b>INERT INGREDIENTS</b> .....	<b>98.35%</b>
*Equivalent to max. 1.2% (butylcarbityl)(6-propyl- piperonyl) ether and min. 0.3% related compounds.	

**Keep Out of Reach of Children**

**CAUTION**

**See side panel for additional  
precautionary statements.**

**NET CONTENTS: 12 FL. OZ.  
(1 QT.) (946 ml)**

\*\*\*\*\*  
\* **MONEY BACK GUARANTEE** \*  
\* If not satisfied, return unused portion to \*  
\* **ARC LABORATORIES** for full refund. \*  
\*\*\*\*\*

Temporarily repels gnats, mosquitoes and biting flies. Contains a grooming agent to ease combing and brushing to remove dead fleas, ticks and lice.

**DIRECTIONS FOR USE**

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

Use only in a well ventilated area. Remove birds and cover aquariums before spraying.

**DOGS AND CATS:** Cover animals eyes with hand and with a firm fast stroke, to get a proper spray mist, spray head, ears and chest until damp. With finger tips rub into face around mouth, nose and eyes. Then spray neck, middle and hind quarters, finishing legs last. For best penetration of spray to the skin, direct spray against the natural lay of the hair. On long haired dogs and cats, rub your hand against the lay of the hair, spraying the ruffled hair directly behind the hand. Make sure spray thoroughly wets ticks. Repeat treatment as needed.

**TO CONTROL SPINOSE EAR TICKS AND EAR MITES,** apply 10 drops to each ear so that it can penetrate wax down to surrounding tissues. Repeat treatment once or twice at 2-3 day intervals.

**Free Bonus Ear Cleaner Enclosed.** Ear Care for Dogs & Cats. Helps to clean the ears, reduce ear odors, and dry the ears.

**Two Simple Steps to Reduce Ear Problems:**

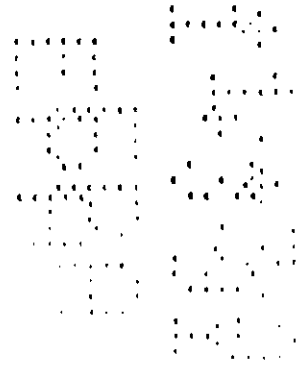
1) First, use Ear Cleaner to clean and help reduce ear odors. Ear Cleaner helps reduce ear odors. Use two or three times a week to keep the ears clean and reduce ear odors. Use before and after bathing, swimming or hunting. Also available in 4 oz., 8 oz., 16 oz., and gallons. Fill the ear canal with Ear Lotion. Gently massage the base of the ears. Use facial tissue or cotton to clean the ears.

2) Next, use Drying Ear Creme and Flea & Tick Killer to keep the ears dry and control any ear aches or ear ticks present. Use after the ears are cleaned with Ear Cleaner. This unique liquid and dry phase creme will dry to a powder to help keep the ears dry and keep Ear Mites and Ear Ticks out of the ears. Also available in 1 oz. and 4 oz. size. To control ear ticks and ear mites, apply 10 drops to each ear so that it can penetrate wax down to surrounding tissues. Repeat treatment once or twice at 2-3 day intervals.

The ears of dogs and cats are a frequent source of problems. The long ear canal (see diagram below) allows dirt and wax to build up.

Ear  
Head  
Ear Canal  
Ear Drum

[Diagram]



The heavy drooping ear of some dogs closes off the opening of the ear canal. This prevents proper air circulation and results in a moist odorous ear.

**EAR MITES:** These are small parasites which crawl in the ear canal of dogs and cats. They chew on the ear and cause scratching, head-shaking, pain and infection. A crusty brownish black material will occur in the ear when mites are present.

**PUPPIES AND KITTENS:** Spray only along back or on your finger tips and rub into coat. Do not use on puppies or kittens under 4 weeks of age.

**PET SLEEPING QUARTERS:** Spray around baseboards, windows, door frames, wall cracks and local areas of floors. Repeat as needed. The bedding should be sprayed and then replaced with fresh bedding for best results.

**HORSES AND PONIES:** To control stable flies, horse flies, deer flies and face flies apply to face, legs, flanks, topline and other body areas commonly attacked by these flies. Repeat treatment as needed.

**STORAGE:** Store in original container in a cool, dry place (preferably locked) inaccessible to children and pets and away from heat or open flame. Protect from freezing.

**DISPOSAL:** Do not reuse empty container. Securely wrap original container in several layers of newspaper and discard in trash collection.

**PRECAUTIONARY STATEMENTS**

**Hazards to Humans & Domestic Animals**

**CAUTION:** Harmful if swallowed or inhaled. Avoid breathing spray mist. Avoid contact with skin, eyes or clothing. Wash skin with soap and water after using. Avoid spraying food or foodstuffs. **ANIMALS:** Avoid contact with animal's eyes. Do not use on nursing animals.

**Statement of Practical Treatment**

**If Swallowed:** Promptly drink one or two glasses of water and contact a physician or poison control center immediately. Give nothing by mouth to an unconscious person. **If Inhaled:** Remove victim to fresh air. Apply artificial respiration if indicated. Contact a physician if needed. **If On Skin:** Immediately remove contaminated clothing and wash affected area with plenty of water. Contact a physician if irritation persists. Wash clothing prior to reuse. **If In Eyes:** Immediately flush eyes with plenty of water. Contact a physician if irritation persists.

**Environmental Hazards**

This product is toxic to aquatic organisms. Do not apply directly to water. Do not contaminate water by cleaning of equipment or disposal of wastes.

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

EPA Reg. No. 44126-1

EPA Est. 43576-CA-1

**ARC LABORATORIES**  
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