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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

> OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

DEC 2 7 2011

Ms. Kim Davis RegWest Company, LLC 30856 Rocky Road. Greeley, CO 80631-9375

Authorized agent for Rod Products

Dear Ms. Davis:

Subject: Revised and basic and proposed alternate confidential statements of formula (CSFs) Revised label to remove furanones from active ingredients, add marketing claims Doo-Not Dog and Cat repellent EPA Registration Number 45987-1 Your submissions dated August 26, 2011; Dec. 5, 2011; and Dec. 13, 2011

The revised basic and proposed alternate A CSFs dated 12/13//2011 are acceptable as submitted, and this information has been added to our files for this product.

Revised label referred to above, and submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the following comments:

1. This product contains a single active ingredient now. Revise the active ingredient statement as follows: "Active Ingredient:.....".

2. The marketing claim: "America's #1 Repellent" is not acceptable. Please delete this claim from the label.

A stamped copy of the label is enclosed for your records. Submit two (2) copies of the final printed label before you release the product for shipment bearing the revised labeling.

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If you have any questions, contact Rita Kumar at (703) 308-8291, or kumar.rita@epa.gov.

Sincerely, Ren

John Hebert Product Manager 7 Insecticide Rodenticide Branch Registration Division (7505P)

Enclosure

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With COMMENTS

under the Federal Insecticide, Fungicide

and Rodenticide Act, As amended, for the pesticide Registered under EPA Reg. No:

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etter Dated:

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# **Doo-Not Dog & Cat Repellent**

[{Select marketing claims from Marketing Claims section below}]

Active Ingredients:	
d-Limonene	4.015%
Other Ingredients*	
Total	
*Contains Mineral Oil	

## Keep Out of Reach of Children CAUTION

See back panel for First Aid and additional Precautionary Statements.

EPA Reg. No. 45987-1

EPA Est. 44673-CA-1 [The letter following lot number indicates EPA Establishment location.]

Net Weight: 2.5 lbs. (1.135 kg)

{Back Panel}

Doo-Not Dog & Cat Repellent

### **PRECAUTIONARY STATEMENT**

Hazard to Humans and Domestic Animals

CAUTION: Prolonged or frequently repeated skin contact may cause allergic reactions on some individuals.

### **DIRECTIONS FOR USE**

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

This effective product discourages dogs from relieving themselves on lawns, flowerbeds, driveways or sidewalks. {Product Name} discourages cats from defecating in flower gardens and elsewhere.

[See Directions for Use on side panel for complete instructions for using this product.]

**Dogs:** Remove old fecal deposits and then sprinkle granules evenly over area at the rate of 1 pound per 800 square feet for light infestations and 1 pound per 100 square feet for heavy infestations. Do not place in piles. Retreat after rains and at least once per week until defecating stops. Resume treatment if problem reoccurs.

**Cats:** Remove fecal material. Remove contaminated dirt. Fill any holes associated with defecation. If cats have defecated on concrete or other hard surfaces, wash and rinse these areas. Sprinkle {product name} on the affected areas at a rate of 1 pound per 100 square feet. Retreat at least once per week until unwanted behavior stopc. Resume treatment if problem reoccurs.

#### Storage and Disposal

Pesticide Storage: Store only in original container, in a dry place inaccessible to children and peis Pesticide/Container Disposal: Non-refillable container; do not reuse or refill this container. If empty: Offer for recycling, if available; otherwise, discard in trash. If partly filled: Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

{Per PR Notice 2007-4 the batch code/lot number will appear on the label or container.}

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#### **Limited Warranty and Disclaimer**

Buyer assumes all risk of use, storage or handling of this material not in strict accordance with label directions and usage. To the extent consistent with applicable law, Seller's liability shall not exceed the purchase price of this product.

This package is sold by weight and package if full when packed, but due to its nature the material is inclined to settle.

Rod Products Co., Inc. PO Box 740145 Boynton Beach, FL 33474 [{telephone number}] [{email address}]

Cat. No.

Printed in U.S.A.

© \_\_\_\_ Rod Products Co., Inc.

{Marketing Claims}

#### America's #1 Repellent

Used to Prevent Defecation by Dogs & Cats on Lawns, Flower Beds, Driveways or Sidewalks

Assists in Keeping Property Clean & Odor Free

Treat up to 1600 Sq. Feet

{End of Marketing Claims}

[] Denotes alternate/optional language {} Denotes language that does not appear on the market label