

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



OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

September 24, 2003

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Easy Gardener, Inc.  
c/o Adams Technology Systems  
5145 Forest Run Trace - Suite B  
Alpharetta, GA 30022-4504

Attention: Ms. Stacy S. Hartis

**Subject: Easy Gardener Dog & Cat Repellent Ready-To-Use Spray with XP-20  
EPA Reg. No. 46260-40  
Your amended application of June 19, 2003**

**Purpose** The purpose of this submission is to revise your label in accordance with PR Notices 2001 and 2001-6.

**Review** The labeling submitted with the above letter, under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) is acceptable, provided you submit one (1) copy of final printed labeling to us, with the following changes, before you ship your product.

1. You may delete the "If swallowed" and "If inhaled" text in your "First Aid" text.
2. We suggest revising the text immediately under "FIRST AID" as:

**FIRST AID**

Have label with you when seeking treatment advise from a doctor, poison control center or the National Pesticide Information Center (NPIC) at 1-800-858-7378.

A copy of the stamped label is enclosed for your records.

**Existing stocks**

Stocks of existing labels may be used for eighteen (18) months.

**Consequence for non-compliance** If this condition is not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of this condition.

**Questions** If you have questions about this letter, please contact me at 703-305-5407 (by phone), 703-305-6596 (by fax), or [peacock.dan@epa.gov](mailto:peacock.dan@epa.gov) (by E-Mail).

Sincerely yours,



Daniel B. Peacock, Biologist  
Insecticide-Rodenticide Branch  
Registration Division (7504C)

**Letter location** Disk121,A:\MNK\46260-40, revised label,9-24-2003.wpd

EPA DRAFT LABEL 06/19/03

**Easy Gardener**  
**Dog & Cat Repellent**  
**Ready-To Use Spray with XP-20\***

Indoor and Outdoor

**A Non-Pressurized Pump Spray to Repel and Train Dogs and Cats**

- Repels dogs and cats from treated areas
- Discourages urinating, soiling and digging

A Training Aid for your Own Pet. Will Repel Dogs and Cats for up to 24 Hours When Applied Daily. Keeps Pets Away from Furniture, Carpets, Trees, Garbage Cans/Bags, and other "Forbidden Areas".

**ACCEPTED**  
with **COMMENTS**  
in EPA Letter Dated:

**ACTIVE INGREDIENT:**

Methyl Nonyl Ketone .....	SEP 24 2003 .....	1.90%
Related Compounds .....		0.10%

<b>OTHER INGREDIENTS:</b> .....	Under the Federal Insecticide, Fungicide, and Rodenticide Act	98.00%
<b>TOTAL:</b>	as amended for the pesticide registered under EPA Reg. No.	100.00%

\*XP-20 is a registered trademark of Easy Gardener, Inc. 46260-40

**KEEP OUT OF REACH OF CHILDREN**  
**CAUTION**  
See Back Panel for Precautionary Statements

Distributed by:  
**EASY GARDENER, INC.**  
PO Box 21025  
Waco TX 76702-1025

EST #46260-KY-1

EPA REG #46260-40

Net Contents: \_\_\_\_\_ fl. oz. ( \_\_\_\_\_ ml)

**EPA DRAFT LABEL 06/19/03**

**DIRECTIONS FOR USE**

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

**SHAKE WELL BEFORE USING**

**USE RESTRICTIONS**

Do not use in commercial food processing or preparation areas. In the home, cover all exposed food, food processing surfaces and utensils during treatment. Do not spray food or feed crops.

For both indoor and outdoor situations, use training whenever possible, including positive (praise) and negative (sharply spoken word backed up with disciplinary action) reinforcement.

This product repels dogs and cats for up to 24 hours when applied daily. Keeps pets away from furniture, carpet, trees, shrubs, garbage cans/bags, and other "forbidden areas".

**INDOOR USE**

Use indoors to break your pet of undesirable habits such as sleeping on furniture and rugs or to keep out of forbidden areas. Always use with consistent training. Praise your pet for good behavior and scold for bad behavior.

**PRE-TREATMENT DIRECTIONS:** Before spraying large areas of rugs, fabrics or plastics, test the effect of this product by treating a small, inconspicuous area. This product may stain or soften some fabrics or plastics. To avoid possible damage, spray a piece of cloth lightly and place it on the object or area to be protected.

**APPLICATION DIRECTIONS:** Spray the object lightly with this product until slightly moistened.

**RE-TREATMENT DIRECTIONS:** Repeat daily, or as necessary, until undesirable habit is broken.

**OUTDOOR USE**

Use outdoors to prevent dogs and cats from disturbing flower beds, areas of lawn, trees, shrubbery, fences, patio furniture and garbage cans/bags.

**NOTE:** This product is not likely to break the established urination patterns of dogs unless it is used as a training aid.

**PRE-TREATMENT DIRECTIONS:** Stray animals are frequently attracted to areas where pets have soiled with feces or urine. To discourage repeat visits, remove any droppings and clean with water.

**APPLICATION DIRECTIONS:** Do not apply directly to foliage of shrubs or to ornamental, soft-bodied plants. Do not apply to food or feed crops. Lightly spray surrounding soil or apply to a piece of cloth and affix near area to be protected every day.

**RE-TREATMENT DIRECTIONS:** Repeat daily, or as necessary, until undesirable habit is broken.

EPA DRAFT LABEL 06/19/03

**STORAGE AND DISPOSAL**

**STORAGE:** Store only in cool, dry place inaccessible to children and pets.  
**If empty:** Do not reuse this container. 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. Never place unused product down any indoor or outdoor drain.

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

**CAUTION**

Harmful if absorbed through skin. Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. Prolonged or frequently repeated skin contact may cause allergic reaction in some individuals. Wash thoroughly with soap and water after handling.

<b>FIRST AID</b>	
<b>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 the National Pesticide Information Center is 1-800-858-7378 for emergency medical treatment information.</b>	
<b>If on skin or clothing</b>	<ul style="list-style-type: none"> <li>•Take off contaminated clothing.</li> <li>•Rinse skin immediately with plenty of water for 15-20 minutes.</li> </ul>
<b>If in eyes</b>	<ul style="list-style-type: none"> <li>•Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>•Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> </ul>
<b>if swallowed</b>	<ul style="list-style-type: none"> <li>•Have person sip a glass of water if able to swallow.</li> <li>•Do not induce vomiting unless told to do so by the poison control center or doctor.</li> <li>•Do not give anything by mouth to an unconscious person.</li> </ul>
<b>If inhaled</b>	<ul style="list-style-type: none"> <li>•Move person to fresh air.</li> <li>•If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.</li> </ul>

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