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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

SEP - 5 1991

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Mr. Bruce Dawson
CCL Custom Manufacturing
4 Lansing Square, Suite 110
Willowdale, Ontario
M2J 5A2

Dear Mr. Dawson:

Subject: Storage Stability Data, Revised Labeling, and Information on Fragrances
CCL Crawling Insect Killer IX
EPA Registration No. 46813-39
CCL Flea & Tick Spray for Dogs and Cats
EPA Registration No. 46813-40
CCL Pump Flea & Tick Spray for Dogs and Cats
EPA Registration No. 46813-41 ✓
Your Submissions Dated August 23, 1990 and February 4, 1991

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable provided that you make the labeling changes indicated below prior to release for shipment of product bearing the amended labeling.

1. For all the above subject products, revise the ingredient statement so that the words **ACTIVE INGREDIENTS** and **INERT INGREDIENTS** are aligned in the same margin printed in the type of the same size and given equal prominence.
2. For EPA Reg. No. 46813-39, make the following changes:
 - a. In paragraph beginning with "Do not use in food areas....", revise the first sentence as follows:

Do not use in food/feed areas of food/feed handling establishments, restaurants or other areas where food/feed is commercially prepared or processed.
 - b. Kennels should follow Homes, i.e. "For Use in Homes, Kennels, and Non-Food Areas of...etc."

CONCURRENCES

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c. Add the following statement to the Directions for Use:

Do not use this product in or on electrical equipment due to the possibility of shock hazards.

d. Under the Directions for Use, add the statement: "For Spot/Cracks and Crevice Treatment Only. Do not use as a space spray."

e. Add the following precautionary statement: "Do not apply to classrooms when in use"

3. For both EPA Reg. No. 46813-40 and 46813-41, make the following changes:

a. Add the following precautionary statement: "Do not apply to sick, old or debilitated animals."

b. Add the heading Physical and Chemical Hazards above the statements beginning with "Contents under pressure...."

c. Make the following additions to the Statement of Practical Treatment:

IF SWALLOWED: Call a physician or Poison Control Center.

IF ON SKIN: Removed contaminated clothing and wash before re-use. Wash with plenty of soap and water. Get medical attention if irritation persists.

IF INHALED: Remove victims to fresh air. Apply artificial respiration to victim if indicated.

d. Under Directions for Use, add the following statement after the sentence "The spray should wet the ticks thoroughly.":

"Do not, however, oversaturate the fur or skin of the animal."

Submit five copies of your final printed labeling before you release the product for shipment. A stamped copy of the labeling is enclosed for your records.

Sincerely yours,

George T. LaRocca
Product Manager 13
Insecticide-Rodenticide Branch
Registration Division (H7505C)

Enclosure

PM13 468 3-1

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
CAUTION**

Harmful if swallowed. Avoid breathing vapors. Do not spray in eyes, face or on genitalia. Do not use on nursing puppies or kittens under 3 months of age.

Do not use or store near heat or open flame.

STATEMENT OF PRACTICAL TREATMENT

If Swallowed: Call a physician.

If In Eyes: Flush with plenty of water. Get medical attention if irritation persists.

If On Skin: Wash with soap and warm water.

If Inhaled: Remove victim to fresh air and call a physician if effects occur.

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 on dogs and cats and will kill ticks for 4 days on dogs and 9 days on 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 under the body. Fluff the hair as you spray so the spray will penetrate to the skin. The spray should wet the ticks thoroughly. Do not spray in face, eyes or on genitalia. Repeat as needed.

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 8 seconds per pound of body weight for heavy or long-haired dogs.

STORAGE AND DISPOSAL

Storage: Store in a cool area away from heat or open flame.

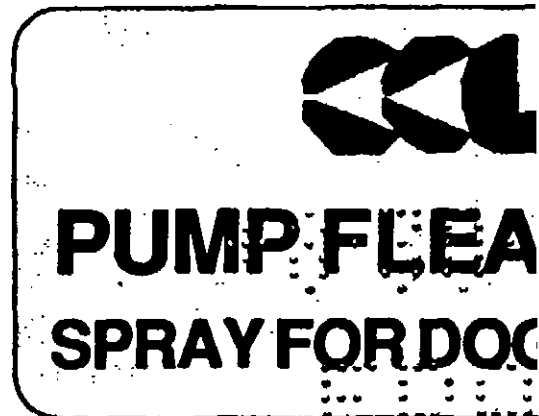
Disposal: Do not re-use empty container. Wrap original container in several layers of newspaper and discard in trash.

EPA Reg. No. 46813-41

EPA Est. No. 46813-CN-01

Manufactured by:
CCL Industries Inc.
26 Waterman Avenue
Toronto, Ontario
M4B 1Y5

SEP - 5 1991



**Pump Spray Residual
and Fleas on Dogs**

ACTIVE INGREDIENTS

Pyrethrins
Permethrin [(3-Phenoxyphenyl) methyl
cis-trans-3-(2,2-dichloroethyl) 2,
2-dimethylcyclopropanecarboxylate]
Related compounds
INERT INGREDIENTS

*cis-trans isomer ratio: M
M

**KEEP OUT OF REACH C
CAUTION**

**See Back Panel for A
Precautionary Stat**

Net Contents _____

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