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658 / 18 / 265/113

Mr. John Plant
Vice President
Professional Pet Products, Inc.
1873 N.W. 97th Avenue
Miami, FL 33172

Dear Mr. Plant:

Subject: Formulation and Labeling Amendments Submitted 6/20/88
EPA Reg. No. 48668-2

The amendments referred to above, submitted in connection with registration under section 3(c)(7)(A) of the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, are acceptable subject to the following comments.

1. Since your formulation change is substantial, submit a complete product chemistry data matrix on the new formulation. Be sure to include the flash point of the product with the propellant and the flame extension of the product including flashbacks if noted. Mixtures marketed under pressure, including those containing hydrocarbons, are subject in their entirety to tests indicated in 40 CFR Sec. 156.10(h)(2)(iii) of the rulepackage. (Flash points for pressurized liquids are conveniently measured after collecting the expelled liquid from the container in an open cup chilled with dry ice. See Aerosol Guide, CEMA)

2. The Confidential Statement of Formula dated 6/20/88 is the basic and only formulation for this product.

3. Change the resmethrin and esbiothrin portions of the label ingredients statement to read as follows.

Resmethrin 0.20%

Esbiothrin 0.30%

BEST AVAILABLE COPY

51207; I:Mendelsohn; C.Disk; KENCO: 05/07/90; de; sw; vo; dd; dg

CONCURRENCES							
SYMBOL							
SURNAME							
DATE							

4. Replace the phrase "wash all equipment, benches, shelving, etc. where exposed food will be handled with potable water." with "food contact surfaces and equipment must be washed with an effective cleaning compound followed by a potable water rinse."
5. We have no verification from the U.S. Department of Agriculture (USDA) that your product can be used in "Food processing plants, etc."

Your labeling makes reference to areas that may be designated as USDA meat and poultry processing plants. You must file a separate application with USDA to obtain approval in such processing plants, in which case the label wording should be changed to reflect USDA acceptance.

You may wish to qualify your site designation to exclude USDA meat and poultry processing plants.

You may submit your USDA application to:

Mr. Charles Edwards
Compound Evaluation Laboratory
Scientific Services, FSQS
Food Ingredient Assessment Division
U.S. Department of Agriculture
Building 306, BARC - East
Beltsville, MD 20705
(301) 344-2566

After you have obtained USDA approval, submit an application with EPA to amend your label appropriately.

6. Delete the statements "Use additional units where free flow of mist to infested areas is obstructed," and "Moving quickly, direct spray into areas which harbor insects such as under sinks, under and behind stoves and refrigerators, and other similar dark areas."
7. Add the word "Flammable" at the beginning of the Physical and Chemical Hazards statements.

If the conditions of this amendment are not complied with after acceptance, the registration will be subject to cancellation in accordance with Section 6(e) of the Act.

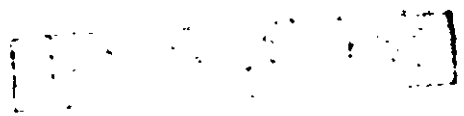
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Submit five (5) final printed labels (labeling) within 75 days. (If finished labeling cannot be furnished within the 75-day period, an extension should be requested.)

Sincerely yours,



Phil Hutton
Product Manager (17)
Insecticide-Rodenticide Branch
Registration Division (H7505C)



4 of 4

ACCEPTED
with COMMENTS
in EPA Letter Dated:

JUN 22 1990

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

48668-2



**PPP FLEA & TICK
TOTAL RELEASE ROOM FOGGER**

ACTIVE INGREDIENTS:

* Resmethrin (5-(phenylmethyl)-3-furanyl) methyl 2, 2 dimethyl-3-(2-methyl-1-propenyl) cyclopropanecarboxylate	0.20% w/w
Esbiothrin(d/l allethrolone d-trans chrysanthemate)	0.30%
† Piperonyl Butoxide	1.20%
INERT INGREDIENTS:	98.30%
	100.00% w/w

- * Cis/trans isomers ratio: max. 30% (±) cis and min. 70% (±) trans.
- † U.S. Patent Nos. 3,465,007 and 3,542,928.
- * Penick's 58P-1382* brand of resmethrin insecticide. Penick Corp., 1050 Wall Street West, Lyndhurst, N.J. 07071.
- † Equivalent to 0.96% (Butylcarbityl) (6-propylpiperonyl) ether and 0.24% related compounds.

SHAKE WELL BEFORE USING

PRECAUCION AL CONSUMIDOR: Si usted no lee ingles, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.

TRANSLATION: To the user: If you cannot read English, do not use this product until the label has been fully explained to you.

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS & DOMESTIC ANIMALS

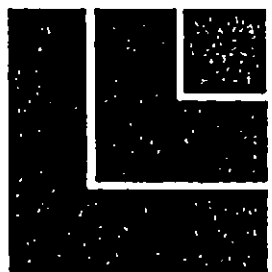
CAUTION Do not apply directly to food or feedstuffs. In the home all food processing surfaces and utensils should be covered during treatment, or thoroughly washed before use. Remove pets, and cover fish aquariums before spraying. In commercial food handling facilities, cover or remove any food and food processing equipment, during application. Do not apply while food processing is underway. After spraying in bakeries and other food processing plants, wash all equipment, benches, shelving, etc. where exposed food will be handled with potable water.

STATEMENT OF PRACTICAL TREATMENT

If swallowed: Call a physician or Poison Control Center. Do not induce vomiting. This product contains petroleum solvent. Aspiration may be a hazard. If in eyes or on skin: Flush with plenty of water. Get medical attention if irritation persists.

PHYSICAL AND CHEMICAL HAZARDS

Contains under pressure. Do not use or store near heat or open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F (54°C) may cause bursting.



professional pet products

**PPP
Flea & Tick
Total Release
Room Fogger**

To Kill Flea Adults and Flea Larvae, Ticks,
and Other Crawling and Flying Insects

SHAKE WELL BEFORE USING

One can treats an area up to 12,000 cubic feet. Use additional units where free flow of mist to infested areas is obstructured.

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

See Side Panel for Additional
Precautionary Statements and Statement
of Practical Treatment

EPA REG. NO. 48668-2 EPA EST. NO. 7056-TX-1

Distributed by:



Professional Pet Products, Inc.
Miami, Florida 33172
Net Weight: oz.

DIRECTIONS FOR USE
use this product in a manner inconsis

SHAKE WELL BEFORE

TO USE, hold can at arms length, depress tab until it clicks into locked position. spray into areas which harbor insects behind stoves and refrigerators, and on level raised surface such as a stair underneath to protect the surface.

Prior to spraying, cover asphalt tile, furniture which may come in contact (used). Close outside doors and and air conditioners.

TO KILL FLEAS (ADULTS AND LARVAE) AND BROWN DOG, the flying insects fleas, beetles, centipedes, crickets, earwigs, snowbugs (pillbugs), spiders and scorpions. **LEAST TWO HOURS.** To kill houseflies (dog flies), gnats (midges), small fly hornets, bees, yellow jackets, leave a cockroaches, as well as all of the above closed for 4 hours. Upon return, vent REPEAT TREATMENT IN TWO WEEKS.

FOR BEST RESULTS, open cabinet doors, contact all areas where insects can be infestation is suspected, destroy pet product registered for animal application.

CONTAINER DISPOSAL

container and place in trash collection. **FOR USE IN HOMES, DOG KENNELS, STABLES, NOT FOR APPLICATION IF ALSO FOR USE IN HOTELS, MOTELS, INDUSTRIAL OFFICE, INSTITUTIONAL STORAGE ROOMS, MILK HANDLING PROCESSING PLANTS; ALSO IN BOATS, HOMES, BUSES, AUTOMOBILES, TRUCKS.**

WARRANTY STATEMENT
this product are based upon tests by product being beyond the control of expressed or implied, is made as to be obtained if not used in accordance safe practice. The buyer must assume damage, resulting from its misuse or other materials.

Product No.