

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

SEP 30 1997

Mr. Jack A. Sitgreaves  
 RSR Laboratories, Inc.  
 501 Fifth Street  
 Bristol, TN 37620

Dear Mr. Sitgreaves:

Subject: 8 Month Response to the Silicon Dioxide/Silica Gel  
 Reregistration Eligibility Document  
 Elite Flea & Tick Powder II  
 EPA Registration No. 51793-21

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.

- Under the Hazards to Humans and Domestic Animals, please revise as follows:

CAUTION: Causes moderate eye irritation. Harmful if swallowed or absorbed through skin. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling. Do not use on nursing kittens or puppies. Do not use on kittens or puppies less than 4 weeks of age.

- Revise the NOTE TO PHYSICIAN as follows: Carbaryl is a cholinesterase inhibitor. Atropine **by injection** is antidotal.
- Base on the acute toxicity profile, the following Statement of Practical Treatment section must be added to the label.

IF SWALLOWED: Call a physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person.

IF ON SKIN: Wash with plenty of soap and water. Get medical attention if irritation persists.

IF IN EYES: Flush with plenty of water Call a physician if irritation persists.

CONCURRENCES

SYMBOL							
SIGNATURE	<i>[Signature]</i>						
DATE							

4. Revise the Environmental Hazards statement as follows:

This product is extremely toxic to aquatic organisms. Do not apply directly to any body of water. Do not contaminate when disposing of equipment washwaters.

A copy of the acute toxicity review is enclosed for your reference.

Submit three 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 (7505C)

Enclosure

ELITE FLEA & TICK POWDER II

FOR CATS AND DOGS  
(Over 4 Weeks of Age)

KILLS FLEAS AND TICKS

ACTIVE INGREDIENTS:

Pyrethrins.....	0.10%
*Piperonyl Butoxide, Technical.....	1.00%
Carbaryl (1-Naphthyl N-methylcarbamate).....	12.50%
Silica Gel.....	10.00%
INERT INGREDIENTS:.....	76.40%
	<u>100.00%</u>

\*Equivalent to 0.8% (butylcarbityl) (6-propylpiperonyl) ether and 0.2% related compounds.

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KEEP OUT OF REACH OF CHILDREN

CAUTION

SEE BACK PANEL FOR PRECAUTIONARY STATEMENTS  
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NET WEIGHT \_\_\_ OZ

MANUFACTURED BY:  
RSR LABORATORIES, INC.  
501 FIFTH STREET, BRISTOL, TENNESSEE 37620

E.P.A. Est. No. 51793-TN-1

E.P.A. Reg. No. 51793-21

DIRECTIONS FOR USE

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

To control Fleas, Ticks and Lice on Dogs and Cats, dust powder liberally over the entire body. Rub dust into hair and around the feet, pads and between the toes so that they are well treated. Take care not to get the powder in animal's eyes, nose or mouth. Dust bedding, kennel and sleeping area regularly. Repeat as needed, but not more often than once weekly. Do not use on Pregnant Dogs.

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PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: May be harmful if swallowed. Avoid breathing dust. Avoid contact with eyes, skin or clothing. Wash thoroughly after handling. Do not use on kittens or nursing puppies. Do not use on kittens or puppies less than 4 weeks of age. Keep out of reach of children. Do not use this product in commercial food areas of food handling establishments, restaurants or other places where food is prepared or processed.

Notice to Physician: Carbaryl is a cholinesterase inhibitor. Atropine is antidotal.

ENVIRONMENTAL HAZARDS

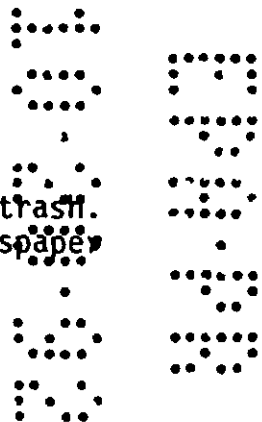
This product is extremely toxic to aquatic invertebrates. Do not apply to water or wetlands. Do not contaminate water by cleaning of equipment or disposal of wastes.

STATEMENT OF PRACTICAL TREATMENT

- IF SWALLOWED: Drink 1 or 2 glasses of water and induce vomiting by sticking finger down throat. Never give anything by mouth to an unconscious person. Call a physician.
- IF ON SKIN: Wash with soap and water.
- IF IN EYES: Flush with plenty of water. If irritation persists, see a physician.

STORAGE AND DISPOSAL

- STORAGE: Store in a cool dry location. Keep cap closed tightly.
- DISPOSAL: Do not reuse bottle. Rinse thoroughly before discarding in trash. Securely wrap original container in several layers of newspaper and discard in trash.



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