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MAY 15 1991

Mr. Robert R. Adams, Jr.
Elite Chemical Corporation, Inc.
225F Horizon Drive
Suwanee, GA 30174


Dear Mr. Adams:

Subject: Label Amendment
FLEARREST! 2 SUPER KNOCKDOWN FLEA AND TICK FORMULA
EPA Registration Number 51793-26
Submission dated February 3, 1990

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments listed below. A stamped copy is enclosed for your records.

1. The label indicates "Long lasting formula". Provide the basis for this claim.
2. The label must make reference to the frequency of use of the product. For example, "Repeat treatment as necessary".
3. The label indicates that the product listed above is "More convenient to use than aerosols & powders". However, 40 CFR section 156.10 (a)(5)(iv) states that a pesticide product is misbranded if a claim is made on the label which provides "...a false or misleading comparison with other pesticides or devices". Delete this inappropriate statement.
4. Submit a specifications sheet or other description of the applicator brush for the record.

Sincerely,


Richard F. Mountfort
Product Manager 10
Insecticide/Rodenticide Branch
Registration Division (H7505C)

ADDITIONAL TIPS FOR USING YOUR FLEARRRESTI® APPLICATOR BRUSH:

1. If you have thick coated or wire-haired pet, such as a Persian cat, or an Airedale dog, you may find it helpful to clear any tangles from your pet's coat before applying the FLEARRRESTI® formula. You may use your FLEARRRESTI® applicator brush for this purpose - just do not squeeze the pump to apply liquid until any tangles are cleared.
2. When you are applying FLEARRRESTI® formula with your applicator brush, you will probably find that frequent short strokes of the pump trigger help you get the right amount of liquid where you want it.
3. Shake the FLEARRRESTI® applicator brush when you are through grooming your pet - preferably over your pet or a sink, and you will clear any excess liquid from the nozzle. Your brush will then be ready for its next use. Keep the pump and brush head tightly screwed onto your bottle of FLEARRRESTI® formula.
4. Do not remove the brush head assembly from the pump unit, or you may damage the pump valve.

GUARANTEE

IF YOUR FLEARRRESTI APPLICATOR BRUSH FAILS TO OPERATE PROPERLY WITHIN 12 MONTHS OF THE DATE YOU PURCHASED IT, PLEASE RETURN THE BRUSH HEAD AND PUMP ASSEMBLY (ONLY) TO SPECIALTY PET PRODUCTS, INC., RT. 1, BOX 263-1AA, WENDELL, NC 27591 AND WE'LL REPAIR OR REPLACE IT AT NO COST TO YOU. (THIS EXPRESS LIMITED WARRANTY COVERS OPERATION OF THE BRUSH PUMP ASSEMBLY AS MANUFACTURED AND ASSEMBLED BY US. IT DOES NOT COVER DAMAGE THAT OCCURS AS A RESULT OF DROPPING THE UNIT, SUCH AS BREAKAGE OF PLASTIC PARTS.)

WATCH FOR OTHER FLEARRRESTI® PRODUCTS - PROVIDING PET OWNERS WITH A TOTAL ENVIRONMENTAL CONTROL SYSTEM TO RID THEIR HOMES AND PETS OF FLEAS AND TICKS:

FLEARRRESTI® 1 30-DAY ANTI-FLEA FORMULA FOR DOGS/Cats

FLEARRRESTI® 2 SUPER KNOCK-DOWN FLEA AND TICK FORMULA OF CATS AND KITTENS/Refills

FLEARRRESTI® YardGuard™ Formula to control Fleas and Ticks in Outdoor Environments

FLEARRRESTI® HouseGuard™ Formula to rid your house of Fleas and Ticks for six months or more.

DIRECTIONS FOR USING THE FLEARRRESTI® APPLICATOR BRUSH:

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

SHAKE WELL BEFORE USING

HOLD BOTTLE IN UPRIGHT POSITION WHEN SPRAYING

1. Remove the brush-pump assembly from the package, including the pick-up tube. Firmly attach the pick-up tube to the pump, and also attach the small filter to the bottom of the pick-up tube.
2. Carefully remove the cap from your bottle of FLEARRRESTI® formula and also remove the inner safety seal.
3. Insert the brush-pump assembly into the bottle of FLEARRRESTI® formula and firmly tighten by turning the cap at the base of the pump clockwise.
4. Point the brush tip in a safe direction—not toward you or your pet's eyes—and prime the pump by giving the trigger a few squeezes until you see liquid appear at the brush tip. The best way to do this is usually to hold the brush directly over the pet's back, near its neck.
5. Now you can brush your pet and treat for fleas. Squeeze the trigger as you brush, adjusting the flow of liquid as you desire. The brush head swivels to conform to your pet's body, so you never have to tilt the bottle of FLEARRRESTI® formula.

Start brushing at the pet's head and move down its back to the tail, brushing in the direction the fur grows. FLEARRRESTI® applies liquid directly to the animal's skin where the fleas live. You do not need to saturate the fur of your pet to give an effective treatment. Your goal is to get the liquid to the animal's skin. Old bedding of pets should be removed and replaced with clean, fresh bedding after treatment of pet areas.

With proper use, your FLEARRRESTI® applicator brush should allow you to treat a smaller dog of up to 25 pounds with 4 ounces of FLEARRRESTI® formula. A larger dog of up to 75 pounds may require 8 ounces of FLEARRRESTI® formula; very large dogs such as St. Bernards and Newfoundlands will require more. Cats require 2 to 4 ounces.

Your FLEARRRESTI® applicator should give many years of service with a minimum of care. You may wash out the brush head periodically by removing the brush-pump assembly from your bottle of insecticide and placing the pick-up tube in a cup of water, and then squeezing the pump trigger a few times to flush out the brush-tip nozzles. Occasionally tighten the brush head clockwise to the pump by turning the cap where the tube comes out of the pump.

EPA Est. No. 51793-CA-1

EPA Reg. No. 51793-26-62993

THIS PRODUCT SHOULD BE KEPT OUT OF THE REACH OF CHILDREN. IT IS NOT A TOY, BUT IS A TOOL TO MAKE CARING FOR YOUR PET EASIER. ALWAYS BE SURE AND FOLLOW THE LABEL INSTRUCTIONS FOR THE FLEARRRESTI® FORMULA INSECTICIDE THAT YOU ARE USING WITH YOUR BRUSH.

Manufactured For:

SPECIALTY
PET PRODUCTS

Wendell, NC 27591

ACCEPTED
with COMMENTS
In EPA Letter Dated
MAY 15 1991
Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
51793-26

BEST AVAILABLE COPY