

NOV - 3 1992

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Dr. W.P. Marsland
International Development & Licensing Corp.
3501 South 6th St.
Lincoln, NE 68502

Dear Dr. Marsland,

Subject: Revised Labeling and Confidential Statement of Formula
Warpaint Insecticidal Paste
EPA Registration Number 58864-2
Your Submissions Dated August 1, and August 10, 1992

The labeling referred to above, submitted August 1, 1992 in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable. A stamped copy is enclosed for your records.

At the next label printing:

1. On the tube label, revise the phrases "Active Ingredients" and "Inert Ingredients" so they are given equal prominence and appear in the same type.
2. Delete the quotation marks from "Do not use this product on horses intended for human food." and "Kills and repels face flies, horn flies,..."
3. On the label insert, under Statement of Practical Treatment, highlight **If Swallowed, If On Skin, and If In Eyes.**

The basic and alternate Confidential Statements of Formula dated August 10, 1992 must be revised in accordance with PR-Notice 91-2 concerning nominal concentration; i.e., the lower certified limits of the individually added ingredients should be lower than (not equal to) the percent by weight or nominal concentration. Provide the lower certified limits based on the pure active ingredients rather than the technical or concentrate.

In addition, there seems to be a slight overformulation in regard to PBO and N-octyl bicycloheptene dicarboximide: The label claim for these, which should lie between the lower and upper certified limits, is 14.0% and 21.0%, whereas the CSF states the lower certified limits as 14.0% and 2.2%, respectively.

SYMBOL								
SURNAME	PM							
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We note in the August 10 submission you indicate your intention to include additional label claims for control of lice and ticks on horses. In order for the Agency to process the amendment, please provide 5 copies of revised labeling. In the interim, the proposed label amendment is under review in the Efficacy Review Section. We will notify you of their comments as soon as available.

Finally, in the notice of conditional registration for this product dated July 24, 1989, item 3 stipulates that additional information is necessary concerning the dermal sensitization study submitted (MRID No. 404888-04). Our records indicate we have not yet received this information. Please explain.

Sincerely,

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

Enclosure

WARPAINT™

INSECTICIDAL PASTE

**KILLS AND REPELS FACE FLIES, HORSE FLIES, STABLE FLIES,
HOUSE FLIES, BLACK FLIES, AND BOT FLIES ON HORSES & FOALS***

ACTIVE INGREDIENTS	By Wt.
Permethrin (3 phenylphenyl) dimethyl (+/-) isls	7.0%
trans-3-(2,2-dichlorostyryl)-2,2-dimethylcyclopropylcarbamate**	0.8%
Reinforced Reaction Products	14.0%
**Piperonyl Butoxide, Technical	21.0%
N-octyl bicycloheptane dicarbodiimide	57.4%
INERT INGREDIENTS	TOTAL
	100.0%

*cis-trans isomer ratio: Min. 35% (+/-) cis and max. 65% (+/-) trans.
**Equivalent to min. 11.2% (butylcarbamyl) (6-propylpiperonyl) ether and max. 2.0% related compounds.

AVAILABLE ONLY THROUGH VETERINARIANS

CAUTION: Keep Out of Reach of Children

SEE BACK PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

"Do Not Use this Product On Horses Intended For Human Food"

Net Contents 0.42 oz. (12 grams)



Front Panel

Top Panel

Front Panel

Back Panel

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. The package will treat 1 adult horse or 2 foals. See insert for complete directions for use.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Harmful if swallowed or absorbed through the skin. Avoid contact with skin, eyes or clothing. Do not contaminate food or feedstuffs. Wash thoroughly with soap after handling.

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Contact a physician or poison control center immediately.
IF ON SKIN: Immediately remove contaminated clothing, wipe material from skin and wash affected area with plenty of soap and water. Contact a physician if irritation persists. Wash clothing prior to reuse. **IF IN EYES:** Flush eyes with plenty of water. Contact a physician if irritation persists.

ENVIRONMENTAL HAZARDS

This product is toxic to fish and other aquatic animals. Do not contaminate any body of water with this product or by cleaning of equipment or disposal of wastes.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal. **STORAGE:** Tighty close cap and store in a dry place (preferably locked). Avoid extreme temperatures. **PESTICIDE DISPOSAL:** Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility. **CONTAINER DISPOSAL:** Dispose of empty tube in a sanitary landfill or by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

EPA Reg. No. 58864-2 Sold By: EPA Est. 58864-MS-001
Marland Laboratory, Inc.
Lincoln, Nebraska 68502
Made in USA

1991

WARPAINT™ - A trademark of Marland Laboratory, Lincoln, Nebraska. Copyright

It requires very good products of WARPAINT™ to be used and read that. Such products of WARPAINT™ are placed on the horse and where they lead to complete. Because WARPAINT™ is not only an insecticide, but also an effective repellent, you will notice that in the case of face fly activity, the repellent activity of the product will be apparent when hours if not immediately after application.

PRODUCT DESCRIPTION:

ACCEPTED
with COMMENTS
in EPA Letter, Dated

NOV - 3 1992

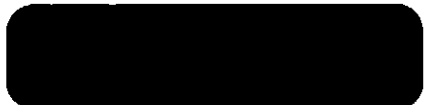
Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.

58864-2

Bottom Panel

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Tube Label



WARPAINT

TRAIL AND HUNTER FACE FLUOR, HORN FLUOR, SINGLE FLUOR,
HORN FLUOR, BLACK FLUOR, AND BOW FLUOR
ON HORNS & POOLS*

ACTIVE INGREDIENTS	By Wt.
Phosphoric Acid (phosphoric acid) (47-62-6)	7.5%
Iron Oxide (black) (7449-91-7)	0.5%
Phosphoric Acid (phosphoric acid) (47-62-6)	14.5%
Iron Oxide (black) (7449-91-7)	21.5%
Water	55.0%
TOTAL	100.0%

*No more than 10% phosphoric acid and iron oxide on horns and pools.
*No more than 11.5% phosphoric acid and iron oxide on horns and pools.

EPH Reg. No. 00004-0 EPH Reg. No. 10004-00-001
NET Contents (1) 6.42 oz. (113 grams) tube

Keep Out of Reach of Children CAUTION

Do Not Use This Product On Horns Intended For Human Use

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. This package will treat 1 adult horn or 2 kids. SEE INSTRUCTIONS FOR COMPLETE DIRECTIONS FOR USE.

PRECAUTIONARY STATEMENTS

Hazard to Humans and Domestic Animals

CAUTION: Hazard if swallowed or absorbed through the skin. Avoid contact with skin, eyes or clothing. Do not inhale dust or fumes. Wash thoroughly with soap after handling.

STATEMENT OF FUNCTION, TREATMENT

IF SWALLOWED: Contact a physician or poison control center immediately.
IF ON SKIN: Immediately remove contaminated clothing, wipe material from skin and wash affected area with plenty of soap and water. Contact a physician if irritation persists. Wash clothing etc. in water. **IF IN EYES:** Flush eyes with plenty of water. Contact a physician if irritation persists.

ENVIRONMENTAL PRECAUTIONS

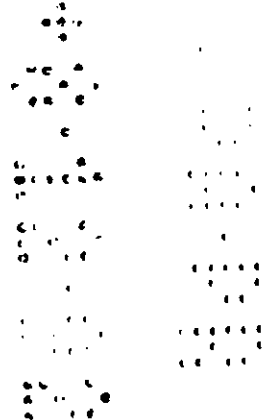
This product is toxic to fish and other aquatic animals. Do not contaminate any body of water with this product or by cleaning of equipment or disposal of waste.

Storage and Disposal

For storage tube container: Do not contaminate water, food or feed by storage or disposal. **SPILLAGE:** Notify State and store in a dry place preferably locked. Avoid extreme temperatures. **HAZARDOUS WASTE:** Waste resulting from the use of this product may be disposed of on site or at an approved waste disposal facility. **CONTAINER DISPOSAL:** Dispose of empty tube in a secondary landfill or by incineration, or if allowed by state and local authorities, by burning, if burned, stay out of smoke.

Sold by
Monsanto Laboratories
Lansing, Michigan 48206
Made in USA

Available only through veterinarians



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Kills and Repels Face Flies, Horn Flies, Stable Flies, House Flies, Black Flies and Bot Flies on Horses & Foals

ACTIVE INGREDIENTS:

- Permethrin: (1-(3-Phenoxyphenyl) methyl (+/-) cis, trans-3-(2, 2-dichloroethoxy)-2, 2-dimethyl-cyclopropanecarboxylate 7.0%
- Related Reaction Products 0.6%
- **Piperonyl Butoxide, Technical 14.0%
- N-Octyl bicycloheptene dicarboximide 21.0%
- INERT INGREDIENTS** 57.4%

*cis trans isomer ratio: Min. 35% (+/-) cis and max .65% (+/-) trans.

**Equivalent to min. 11.2% (butylcarbityl) (6-propylpiperonyl) ether and max 2.0% related compounds.

CAUTION: Keep Out of Reach of Children
"Do Not Use This Product on Horses Intended for Human Food"

PRODUCT DESCRIPTION

It requires very small amounts of WARPAINT™ to kill and repel flies. Small amounts of WARPAINT™ are placed on the horse; only where flies tend to congregate.

WARPAINT™ when applied to the horse attaches to the hair of the horse and slowly releases the insecticide over a period of weeks. Full body fly control does not usually occur in the horse, until 1 to 2 days after the application. The reason for this is it takes awhile for the formulation to release the insecticide onto the horse's hair.

Because WARPAINT™ is not only an insecticide, but also an effective repellent, you will notice that in the case of face fly activity, the repellent activity of the product will be apparent within hours if not immediately after application.

After a period of two to three weeks, as the insecticide is released onto the horse's hair, you will find that WARPAINT™ becomes powdery and will fall off the horse's hair leaving no adverse effects on the horse's appearance.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Do not apply to a wet animal since the product will not adhere to moist surfaces.

FULL BODY FLY CONTROL:

Adult Horses: For the treatment of pastured horses, and those that are not going to be ridden for a period of weeks, it is recommended that a full dose, one tube (12 gms.), of WARPAINT™ be applied as a single treatment. This should provide adequate fly control for approximately one week on pastured horses.

Apply 1 gram under each eye, 2 grams on back and 2 grams on each leg below the hock or knee - 12 grams total dose (one tube) as a single treatment. **DO NOT REPEAT TREATMENT FOR 7 DAYS.** See application techniques and illustrations.

LOCAL FLY CONTROL

For horses that are to be ridden and handled frequently, lesser amounts of WARPAINT™ applied more frequently are a better choice. Lesser amounts of WARPAINT™ applied discreetly and prudently to the horse can provide effective local fly control for several days to a week. If this technique is used, remember not to apply more than one tube (12 grams) of WARPAINT™ to a horse in any 7-day period. See application techniques and illustrations.

APPLICATION TECHNIQUES

FACE FLIES: Apply 1 gram under each eye. Maximum control is achieved if WARPAINT™ is applied under the eye, close to the eyelid. WARPAINT™ should not be applied directly into the eye. Treatment may be repeated when flies again reach bothersome levels. Invert tube while squeezing and apply a narrow ribbon of paste under each eye, from corner to corner along the lower lid. Smooth out with dome top on applicator tube to a 1-inch wide stripe under the eye. A 1-inch wide stripe under the eye will apply approximately 1 gm of WARPAINT™ to each eye.

HORN FLIES, BLACK FLIES, AND HOUSE FLIES: Apply 2 gms to the back. To apply WARPAINT™ to the back of the horse utilizing the squeeze tube applicator, invert the container and touch the tip of the applicator to a spot on the midline of the back just behind the withers. Squeeze the container and move the applicator tip to apply paste in a 4-inch long ribbon. Smooth out ribbon with dome top on tube to a 1-inch wide stripe. A 4-inch long by 1-inch wide stripe will apply approximately 2 grams of WARPAINT™ to the back of the horse.

STABLE FLIES AND BOT FLIES: Apply 2 gms to each leg. When applying WARPAINT™ to the legs of the horse, utilizing the squeeze tube applicator, it is easiest to apply the material to the front of the horse's leg. Start at a place on the front of the leg 4 inches below the knee or the hock. Invert the container and touch the tip of the applicator to the spot to be treated. While squeezing the container, move the applicator tip up the horse's leg 4 inches toward the knee or hock, then stop and smooth out with dome top on tube to a 1-inch wide stripe.

BOT FLIES: To kill and repel bot flies during the egg laying season, WARPAINT™ should be applied over the bot eggs already on the horse. A 4-inch by 1-inch wide stripe should be painted over the area where the bot eggs exist. This should be done instead of applying WARPAINT™ to the front of the leg since this application will also control stable flies.

FOALS: The same technique for applying WARPAINT™ can be used on foals, except only 1/2 of the adult amounts should be used. One tube (12 gms) will treat 2 foals. Since the foals' eyes are smaller than adult horses, a 1-inch wide stripe under each eye of a foal will apply only 1/2 gm of WARPAINT™ under each eye. When applying WARPAINT™ to a foal's back and legs make the stripe only 2 inches long instead of the 4-inch long stripe used on adult horses. This will insure that a foal will only receive one-half of the adult horse dose. Remember, one 12 gm. tube also treat two foals.

PRECAUTIONS FOR USE

Do not apply to the hair of a wet animal since the product will not adhere to moist surfaces. WARPAINT™ once applied to the hair of the horse cannot be wiped off. Therefore, it should not be applied within 2 or 3 weeks of an anticipated show or event in which the presence of small amounts of WARPAINT™ on the horse's hair would have an adverse effect on the horse's appearance. WARPAINT™ will stain clothing and once it is on clothing, it is very difficult to remove. Therefore, care should be taken in applying WARPAINT™ to the horse to avoid getting it on clothing. If WARPAINT™ does get on clothing, nail polish remover is helpful in removing it, but it often takes frequent applications of nail polish remover with frequent washings to remove the material from clothing. Do not use nail polish remover to remove WARPAINT™ from a horse's hair. As with any product, certain horses may be sensitive to one of the ingredients in WARPAINT™ and develop some local irritation. If irritation occurs, discontinue use. If irritation persists, consult your veterinarian.

HOW SUPPLIED:

Dome Top Squeeze Tube New wt. 42 oz. (12 gm)

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals -

CAUTION: Harmful if swallowed or absorbed through the skin. Avoid contact with skin, eyes or clothing. Do not contaminate food or foodstuffs. Wash thoroughly with soap after handling.

STATEMENT OF PRACTICAL TREATMENT: If swallowed: Contact a physician or poison control center immediately. If on skin: Immediately remove contaminated clothing, wipe material from skin and wash affected area with plenty of soap and water. Contact a physician if irritation persists. Wash clothing prior to reuse. If in eyes: Flush eyes with plenty of water. Contact a physician if irritation persists.

ENVIRONMENTAL HAZARDS: This product is toxic to fish and other aquatic animals. Do not contaminate any body of water with the product or by cleaning of equipment or disposal of waste.

STORAGE AND DISPOSAL: For squeeze tube containers: Do not contaminate water, food or feed by storage or disposal. **STORAGE:** Tightly close cap and store in a dry place (preferably sealed.) Avoid extreme temperatures. **PESTICIDE DISPOSAL:** Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility. **CONTAINER DISPOSAL:** Dispose of empty tube in a sanitary landfill or by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

WARPAINT™ Insecticide Paste is a trademark of MARSLAND LABORATORIES. Copyright 1992. U.S. patents pending. EPA Reg. No. 56884-2 EPA Est. 56884-MS-001

Made in U.S.A.
Sold by MARSLAND LABORATORIES, Lincoln, NE 68502
Available only through veterinarians

FU
Ap
1-3
low
gm