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59509-1

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

07 MAY 1992

Mr. Gary Chandler
Be-Cha Manufacturing Company
1110 West 41st Street
Tulsa, Oklahoma 74107

Dear Mr. Chandler:

Subject: Revised Labeling
Horse Power Formula Z 2001 Bug Killer
EPA Registration Number 59509-1
Submission dated April 30, 1992

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. Submit one (1) copy of the finished product label prior to releasing the product for shipment.

- 1. Delete the term "GENERAL" which appears at the top of the left panel of the product label.
2. Delete the following from the RIGHT panel of the product label:

DIRECTIONS FOR USE

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

- 3. Add the following sentence to left panel of the product label directly following the heading DIRECTIONS FOR USE:

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

- 4. Provide the basis for the label text which appears in the first paragraph under the heading STATEMENT OF PRACTICAL TREATMENT. This product is formulated for use directly on the skin of the animals without a subsequent rinse. It appears that the label language "May be harmful...absorbed through skin" and "Do not ...get on skin" is not appropriate for a product which is applied directly to the skin.

Table with 4 columns and 3 rows: SYMBOL, SURNAME, DATE. The first row contains the text from the previous list item.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

- 5. Revise the **IF ON SKIN** section of the **STATEMENT OF PRACTICAL TREATMENT** to read as follows:

IF ON SKIN: Wash exposed skin with soap and water.

- 6. Add the following sentence as a footnote to the ingredients statement:

Contains petroleum distillate.

- 7. Revise the piperonyl butoxide footnote to read as follows:

*Equivalent to 1.07% of (butylcarbityl-6-propyl-piperonyl) ether and 0.27% related compounds.

- 8. In the ingredients statement, add the words **ACTIVE INGREDIENTS** aligned to the same margin as and with equal prominence to the words **INERT INGREDIENTS**.

Sincerely,

RFM

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

CONCURRENCES							
SYMBOL							
SURNAME							
DATE							

GENERAL

FORMULA "Z" 2001 is formulated for horses, cattle, and domestic animals.

FORMULA "Z" 2001 is also a grooming aid and coat conditioner.

FORMULA "Z" 2001 kills and repels Stable Flies, Horn Flies, House Flies, Face Flies, Horse Flies, Deer Flies, Mosquitoes, Gnats, Ticks, Fleas, and Lice.

DIRECTIONS FOR USE:

FORMULA "Z" 2001 has been especially developed for use on animals. It provides a protective hair coating against flies, while imparting a high sheen to the hair when brushed out. Using one to two ounces per head per day will give adequate protection. Apply by either a soft cloth or a fine mist spray.

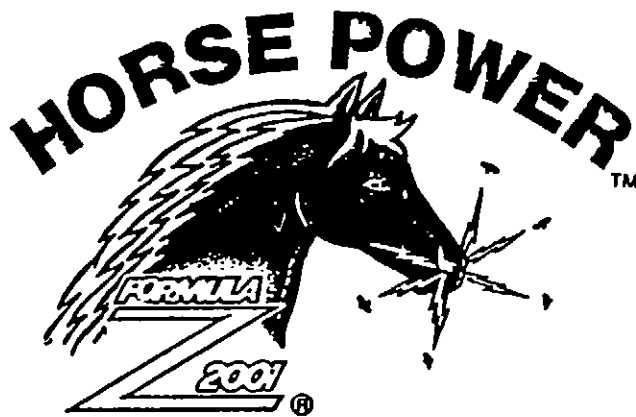
USED AS A SPRAY:

FORMULA "Z" 2001 may be applied as a fine mist spray to stable area, and around stable area for fast paralysis to kill flies. Do not wet animals skin, or exceed two ounces per application. To control blood sucking lice, apply to the infested areas of the animal, using a stiff brush to get spray to the base of the hair.

USE AS A WIPE ON:

First, brush animal to remove excess dirt and dust. Moisten (but do not wet to the point of dripping) a soft cloth and rub over the hair. It is best to apply by rubbing against the hair growth. Pay special attention to the legs, shoulders, shank, neck and facial areas where flies are most often seen. Only a light application is required. Avoid using an excessive amount on your animal. Do not wet skin after application. brush out thoroughly to bring out bright sheen on the coat.

BE-CHA MANUFACTURING CO.
1110 WEST 41st STREET
TULSA, OK 74107
918-583-3079
MADE IN U.S.A.



BUG KILLER
for FLIES & MOSQUITOES

CONTAINS PYRETHRINS • LEAVES NO OILY RESIDUE

Pyrethrins.....	0.23%
*Piperonyl Butoxide.....	1.34%
Di-n-propyl isocinchomeronate....	1.29%
Inert Ingredients.....	97.14%
	100%

*Equivalent to 80% of (butylcarbityl 6-propyl-piperonyl) ether and 20% related compounds

KEEP OUT OF REACH OF CHILDREN
WARNING

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS AND STATEMENT OF PRACTICAL TREATMENT

Net Contents: 32 Fl. Oz. (946 ml)

EPA Reg. No. 59509-1

EPA Est. No. 59509-0K-001

PRECAUTIONARY HAZARDS TO HUMANS & For animal use only. No

STATEMENT OF PRACTICAL TREATMENT

May be harmful if swallowed, inhaled, or not breathe vapors, get in eyes, on skin.
IF INHALED: Remove victim to fresh air.
IF SWALLOWED: Call a physician or poison control center. This product contains petroleum products which are a fire and explosion hazard.
IF IN EYES: Flush with plenty of water.
IF ON SKIN: Wash with plenty of soap and water. Irritation persists.
To minimize risk of dermal, oral, or inhalation exposure, use protective apparatus.

ENVIRONMENTAL PRECAUTIONS

This product is toxic to fish. Do not apply to water.

PHYSICAL & CHEMICAL PROPERTIES

Do not use or store near heat or open flame. Do not use near pilot light.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with the labeling.
STORAGE AND DISPOSAL: Do not contaminate water, food, or feed by storage or disposal.
PESTICIDE DISPOSAL: Wastes resulting from the use of this product should be disposed of on site or at an approved collection point.
CONTAINER DISPOSAL: For containers 1 gallon and over, triple rinse for equipment, and then reuse, recycle, or puncture and dispose of in a sanitary manner, or other approved State and Local procedures.

WARRANTY STATEMENT

Our recommendations for use of this product are based on current knowledge and are to be reliable. The use of this product is at the user's discretion. No guarantee, expressed or implied, is made as to the results to be obtained from the use of this product. The user assumes all responsibility including injury or damage to property, or in combination with other materials.

ACCEPTED
with COMMENTS
In EPA Letter Dated

07 MAY 1992

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

59509-1