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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

OCT 19 1990

Mr. Robert Lawson Rudoucks USA, Inc. 303 Fifth Avenue, Suite 1904 New York, NY 10016

Dear Mr. Lawson:

Subject: Get Oli

EPA Registration No. 59578-2 Your Lauter Dated September 20, 1990

The labeling referred to above, submitted in connection with registration under the Federal Insecticide; Fungicide, and Redeaticide Act (FIFRA), is acceptable subject to the comments listed below.

- 1. Relocate the statement "Do not apply directly to food crops" from the back panel of your label to the front panel directly under "a non-pressurized pump spray to repel and train Doys and Cate."
- Rejocate the child hazard warning to directly above the signal word.
- 3. Correct the spelling of "labeling."
- 4. Desete "etc" from the possible outdoor use sites. Also delete the last sentence in the outdoor paragraph.
- 5. Delete "Get Of: My Garden" as the name of the subject product. Replace with "Get Of:."

Submit five (5) copies of your final printed labeling before you release the product for shipment. Refereto the A-79 enclosure for a further description of final printed labeling.

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EPA Form 1320-1 (12-70)

OFFICIAL FILE CORY.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with PIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

A stamped copy of the label is enclosed for your records.

Note that the name of the subject product is "Get Off" and not "Get Off My Garden" as indicated in the subject letter. We want to remind you of item 2 in our letter of September 24, 1990.

Sincerely yours,

nam

Marilyn A. Mautz Acting Product Manager (16) Insecticide-Rodenticide Branch Registration Division (H7505C)

Enclosures

GET OFF

MY GARDEN

INDOOR

OUTDOOR

ACCEPTED

Dog & Cat Repellent

A non-pressurized pump spray to repel and train Dogs and Cats

Active Ingredients:	in EPA Letter Dated:
Methyl Nonyl Ketone 1.9% Related Compounds	Under the Federal Inscetticide. Fungicide, and Rodenticide / as amended, for the postice registered under EPA Rog. Roc.
	CG~7 A-7

CAUTION

Keep out of reach of children

See back panel for additional precautionary statements

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EPA Reg. No 59578-2 EPA Est. No.50702-IL-1

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION

Harmful if swallowed. Avoid contact with skin, eyes or clothing. Wash contaminated skin promptly with soap and warm water. For eyes, flush with water. Get medical attention if any irritation persists. Avoid contamination of food and foodstuffs.

DO NOT APPLY DIRECTLY FOOD CROPS

DIRECTIONS FOR USE

It is a violation of federal law to use this product in a manner inconsistent with it's labelling.

SHAKE WELL BEFORE USE

GENERAL: This non-preasurized spray can help you make your pets and stray animals "GET OFF" your furniture, rugs and outside home and garden areas when used in conjunction with training methods such as sharply spoken words and disciplinary action.

INDOORS: To alter your pet's habits such as sleepnig on rugs, furniture or other areas in your home, spray the area lightly to slighlty moisten. To test the effect of this product, first treat a small inconspicuous area. This product may stain some fabrics or plastics. Alternatively, to avoid any possible damage, lightly spray a piece of cloth and place it on the area or object in your home you want to protect. Repeat as often as necessary until the Pet's habits are broken.

OUTDOORS:To prevent your pet, or stray animals, from urinating or soiling outdoor localised areas (steps, tree trunks, bases of shrubbery, evergreens, patches of lawns, flower beds or trash cans or the perimeter of vegetable gardens etc.) remove any droppings, hose clean and spray the spot. Repeat as often as necessary until the habbits are changed. For larger areas with longer lasting outdoor effectiveness, use "GET OFF MY GARDEN" water crystals.

NOTE: Do not apply directly onto vegetables. Breaking of urination habits should only be attempted if the area is thoroughly cleaned. No not apply directly to foliage of shrubs or to ornamental soft-bodied plants.

STORAGE AND DISPOSAL:

Storage: Store only in original container, in a dry place inaccessible to children and pets. :

Disposal: Do not reuse empty container. Securely wrap in newspaper and discard in trash.

Packed for: Rudducks USA Inc. 303 Fifth Ave. New York, N.Y. 10016

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

DEC 1'1 1990

CERTIFIED MAIL (# 955444)

Rudducks USA, Inc. 303 Fifth Avenue, Suite 1904 New York, NY 10016

Gentlemen:

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

5387321 10/9 5387323 11/30

Subject: Get Off

EPA Registration No. 59578-2

Your letters of October 9 and November 30, 1990 Our letters of September 24 and October 19, 1990

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

Prior to your next printing, submit five (5) copies of revised, draft labeling with the changes indicated below. Indicate in your cover letter when you would begin using the revised labeling, not to exceed January 1, 1992.

1) Change your product name to clarify that the product is for use on garden perimeters, not for direct application on the plants themselves. The following would be acceptable:

GET OFF MY GARDEN PERIMETER SPRAY

The words "PERIMETER SPRAY" must at least be of the same type size as "MY".

2) In your December 7, 1990, telephone conversation with Mr. Daniel Peacock, you indicated the existence of both efficacy data and acute toxicity data. Within 90 days of receipt of this letter, submit these studies to the Agency for review in the format outlined in PR Notice 86-5. These data will provide us with a clearer perspective of the issues raised in our September 24 and October 19, 1990, letters. The data submitted are being returned for formatting.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

Sincerely yours.

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Marilyn A. Mautz Acting Product Manager 16 Insecticide-Rodenticide Branch Registration Division (H-7504C)

Enclosures: 1) Stamped label

2) Unformated efficacy data

MAM:dbp:CM2:RM265:557-4407:12/10/90:Peacock Disk 51(6)

59578-2