

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

October 19, 2005

Dr. Hubert R. O'Neal
 KMG Bernuth, Inc.
 10611 Harwin Drive, Suite 402
 Houston, Texas 77036

Subject: Revise Labeling per Agency's Notice of Re-registration and Product Transfer Letter dated 6/25/99 and 01/27/03, respectively.
 Americare Rabon Flea & Tick Collar for Dogs
 EPA Reg. No. 61483-53
 Your submission dated June 25, 2005

Dear Dr. O'Neal:

We have reviewed the above referenced submission, in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended. The labeling is acceptable with the following comments:

- Change the EPA Reg. No. from 61483-55 to **61483-53**
- Under Precautionary Statements:
 - Revise the statement "Wash thoroughly with soap and water after handling" to read - ***"Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco."***
 - After precautionary statements, add ***"Sensitivities may occur after using ANY pesticide products for pets. If signs of sensitivity occur, remove collar and bathe the pet with mild soap and rinse with large amounts of water."***
- Under General Precautions and Restrictions, add ***"Do not use this product on animals simultaneously or within 30 days before or after treatment with or exposure to cholinesterase inhibiting drugs, pesticides or chemicals. Flea and tick collars may be immediately replaced with new collars."***

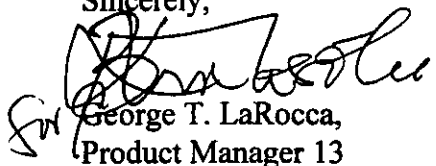
CONCURRENCES

SYMBOL	7505C							
SURNAME	Atkinson							
DATE	10/19/05							

2/6

Please make the above stated changes to the product's labeling and submit two copies of the revised final printed label to the Agency. Enclosed, please find a copy of the stamped label for your records. If you have any questions concerning this action, contact Dr. B. A. Akinlosotu at (703) 605-0653.

Sincerely,


George T. LaRocca,
Product Manager 13
Insecticide Branch
Registration Division (7505C)

enclosure:

ACCEPTED
with COMMENTS
In EPA Letter Dated:

OCT 19 2005

Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
61483-55

Page 1 of 4
Americare Dog Collar
6/24/05

AMERICARE RABON® FLEA & TICK COLLAR FOR DOGS

Kills For 5 Months

ACTIVE INGREDIENT:

Tetrachlorvinphos: (Z)-2-Chloro-1-(2,4,5-trichlorophenyl)
vinyl dimethyl phosphate

OTHER INGREDIENTS:

TOTAL:

13.7%

86.3%

100.0%

EPA Reg. No. 61483-55

EPA Est. No. 4691-KS-01

DO NOT LET CHILDREN PLAY WITH THIS COLLAR
CAUTION

FIRST AID

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not give anything by mouth to an unconscious person. Do not induce vomiting unless told to by a poison control center or doctor.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

HOTLINE NUMBER

Contains an organophosphate that inhibits cholinesterase.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-424-9300 for emergency medical treatment.

Do not use this product on animals simultaneously or within 30 days before or after treatment with or exposure to cholinesterase inhibiting drugs, pesticides or chemicals. However, flea and tick collars may be immediately replaced with new collars.

NOTE TO PHYSICIANS AND VETERINARIANS

This product is a cholinesterase inhibitor. If symptoms of cholinesterase inhibition are present, atropine sulfate by injection is antidotal. 2-PAM is also antidotal and may be administered, but only in conjunction with atropine.

Mfd. For: KMG-Bernuth, Inc
Houston, Texas 77036 (713) 988-9252

Contents: 1 Collar
Net Weight: 0.85 oz., 24 g.

**CONDITIONS OF SALE AND
LIMITATION OF WARRANTY AND LIABILITY**

NOTICE: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

The Directions for Use of this product should be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, presence of other materials or other influencing factors in the use of the product, which are beyond the control of **KMG-BERNUTH, INC** or Seller. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold **KMG-BERNUTH, INC** and Seller harmless for any claims relating to such factors.

KMG-BERNUTH, INC warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or **KMG-BERNUTH, INC**, and Buyer and User assume the risk of any such use. **KMG-BERNUTH, INC MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.**

In no event shall **KMG-BERNUTH, INC** or Seller be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF KMG-BERNUTH, INC AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF KMG-BERNUTH, INC OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

KMG-BERNUTH, INC and Seller offer this product, and Buyer and User accept it, subject to the foregoing conditions of sale and limitations of warranty and of liability, which may not be modified except by written agreement signed by a duly authorized representative of **KMG-BERNUTH, INC**.

**READ ENTIRE LABEL BEFORE EACH USE
USE ONLY ON DOGS**

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Harmful if swallowed or absorbed through skin. Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. Prolonged or frequently repeated skin contact may cause allergic reaction to some individuals. Wash thoroughly with soap and water after handling.

DIRECTIONS FOR USE – Read the entire label prior to use.

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

GENERAL PRECAUTIONS AND RESTRICTIONS

Do not use on puppies under 6 weeks. Consult a veterinarian before using this product on debilitated, aged, or medicated animals. If used on pregnant or nursing dogs, do not replace collar until the puppies are at least 6 weeks old. If signs of sensitivity occur, remove collar and bathe your pet with mild soap and rinse with large amounts of water.

APPLICATION INSTRUCTIONS

Remove collar from package, unroll and stretch to activate insecticide generator. To activate collar, hold at each end and **STRETCH**. The collar is ready to work.

Do not unroll collar until ready to use. Place the Americare Rabon Flea & Tick Collar around the dog's neck, adjust for proper fit and secure in place. The collar must be worn loosely to allow for growth of the dog and to permit the collar to move about the neck. Generally, a properly fitted collar is one that when fastened will snugly slide over the dog's head. Leave 2 or 3 inches on the collar for extra adjustment and cut off and dispose of the extra length. Some animals may become irritated by any collar if it is applied too tightly. If this occurs, loosen the collar. If the irritation continues, remove the collar from the animal. This collar is intended for use only as an insecticide generator.

Kills fleas and ticks common to dogs. The Americare Rabon Flea & Tick Collar will begin to kill fleas and ticks immediately. It's full protection against harder to kill ticks will be built up within a few days after being placed on the pet. For continuous flea and tick protection under normal conditions, replace the collar every **5 months**. Under conditions where dogs are exposed to severe flea or tick infestations, it may be necessary to replace the collar more frequently, however do not replace the collar more frequently than every **4 months**. Wetting will not impair the collar's effectiveness or pet's protection. If the dog goes swimming or is out in the rain, it is not necessary to remove the collar. The Americare Rabon Flea & Tick Collar may be worn with a regular collar.

STORAGE AND DISPOSAL

DO NOT contaminate water, food or feed by storage or disposal.

PESTICIDE STORAGE: Store in original container in a dry place away from children.

PESTICIDE DISPOSAL: Do not reuse empty pouch. Dispose in trash.