

7 MAR 1996

Rob R. Adams, Jr.
R&M Regulatory Services
65 Roswell Street, Bldg. 400
Alpharetta, GA 30201-1931

Dear Mr. Adams:

Subject: Response to Dipropyl Isocinchomeronate DCI
R&M Flea & Tick Spray #11
EPA Registration Number 65636-47
Submission Dated August 3, 1994

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:

1. Add the statement "Not for use on horses intended for human consumption" to the front panel of the label. Ensure that this phrase pertains to both horses and foals.
2. Revise the Physical or Chemical Hazards Statement to read as follows:

"Flammable. Keep away from heat or open flame. Do not use this product in or on electrical equipment due to the possibility of shock hazard."
3. Revise the "IF IN EYES" Statement of Practical Treatment to read as follows:

"Hold eyelids open and flush with a steady, gentle stream of water for 15 minutes. Get medical attention."
4. Delete the statement "Do not use this product in or on electrical equipment due to the possibility of shock hazard." from the Directions for Use. You will have moved this information to the Physical or Chemical Hazards statement.

A stamped copy of the label is enclosed for your records. Submit three copies of revised final printed labeling prior to releasing product for shipment.

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If you have any questions or comments, please contact me at
(703) 305-6788.

Sincerely,

RPK

Richard P. Keigwin, Jr.
Product Manager 10
Insecticide-Rodenticide Branch
Registration Division (7505C)

MAR 1986

Product of Regulatory Services, Inc.
EPA Registration No. 65636-1
as amended by EPA Reg. No. 65636-47
registered under EPA Reg. No.

R & M FLEA & TICK SPRAY #11

REPELLENT SPRAY WITH SOOTHING ALOE, LANOLIN & PABA SUNSCREEN
FOR CATS - KITTENS - DOGS - PUPPIES - HORSES - FOALS

KILLS FLEAS - LICE - TICKS
REPELS GNATS-FLIES-MOSQUITOES FOR 2 TO 3 DAYS
ALSO FOR USE AS A GROOMING AID AND COAT CONDITIONER

ACTIVE INGREDIENTS:

Pyrethrins.....	0.15%
*Piperonyl Butoxide, Technical.....	1.00%
N-Octyl Bicycloheptene Dicarboximide.....	0.50%
Di-n-Propyl Isocinchomerate.....	0.50%
INERT INGREDIENTS:.....	97.85%
Total 100.00%	

*Equivalent to 0.80% of (Butylcarbityl) (6-propyl-piperonyl) ether and 0.20% related compounds.

KEEP OUT OF REACH OF CHILDREN
WARNING
See Back Panel for Precautionary Statements

Manufactured by:

R & M REGULATORY SERVICES
65 ROSWELL STREET - BLDG 400
ALPHARETTA, GA 30201-1931

EPA EST #65636-GA-1

EPA REG #65636-

Net Contents ___ oz.

DIRECTIONS FOR USE

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

USE ONLY IN WELL VENTILATED AREA
CATS and DOGS

Cover animals eyes with hands. With a firm stroke to get a proper spray mist, spray head, ears and chest until damp. With fingertips, rub into face around mouth, nose and eyes. Then spray neck, middle and hind quarters, finishing legs last. For best penetration of spray to the skin, direct spray against the natural lay of the hair. On long haired dogs rub your hand against the lay of the hair, spraying the ruffled hair directly behind the hand. Make sure spray thoroughly wets ticks. Repeat treatment as needed.

PUPPIES and KITTENS

Treat same as cats and dogs except nursing puppies and kittens. Spray only along back or on your fingertips and rub in.

PETS SLEEPING QUARTERS

Spray around baseboards, windows, door frames, wall cracks and local area of floors. If mosquitoes, gnats or flies are present, spray lightly into the air. Repeat as needed. The pets bedding should be sprayed, making sure the area beneath the bedding is sprayed. After spray has dried, remove old bedding and replace with fresh bedding. Treat pets with one of our registered Flea & Tick control products before allowing them to enter treated area.

HORSES

Use full strength to control stable flies, horse flies, deer flies, face flies, gnats and mosquitoes. Apply to face, legs, flanks, top line and other body areas commonly attacked by these flies. Do not wet horses skin with excessive spray. After application, brush thoroughly to bring out bright sheen on the coat. Repeat treatment as needed. Do not use on horses intended for human consumption.

HOLD BOTTLE IN UPRIGHT POSITION WHEN SPRAYING

Do not use this product in or on electrical equipment due to the possibility of shock hazard.

STORAGE AND DISPOSAL

Storage: Do not use or store near heat or open flame.
Disposal: Do not reuse container. Wrap and put in trash.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

WARNING

HUMANS: Causes eye irritation. Do not get in eyes or on clothing. Harmful if swallowed or inhaled. Avoid breathing mist. Keep out of eyes. Avoid contamination of food. Wash hands with soap and water after using.

ANIMALS: Avoid treatment of foals, nursing kittens & puppies under six weeks old. If treatment is necessary spray on tips of fingers & rub coat.

ENVIRONMENTAL HAZARDS: This product is toxic to fish. Keep out of lakes, streams, ponds, tidal marshes and estuaries. Do not apply where runoff is likely to occur.

PHYSICAL OR CHEMICAL HAZARDS: Flammable. Keep away from heat and open flame.

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STATEMENT OF PRACTICAL TREATMENT

IF IN EYES: Flush with plenty of water. Get medical attention.

IF ON SKIN: Wash with plenty of soap and water. Get medical attention if irritation persists.

IF SWALLOWED: Drink promptly a large quantity of milk, egg whites, gelatin solution, or if these are not available, drink large quantities of water. Avoid alcohol.

IF INHALED: Remove person to fresh air..

Directions for Liquid Dispensing Comb

KILLS FLEAS, TICKS, AND LICE ON CONTACT

The teeth of the comb are made of a porous nylon fiber much like a felt-tip pen. By simply combing your pet, the special flea and tick killing liquid saturates the comb's sturdy teeth and coats the animal's skin, fur and hair, killing fleas and ticks on contact. The special liquid also contains agents to help keep your pet's coat smooth and shiny, so your pet benefits from a healthy grooming, too. Comb is safe and gentle to be used daily.

DIRECTIONS FOR USE

Remove plug. Holding comb level, slowly add liquid through filling hole until wick is visibly damp. Do not overfill. Replace plug and allow a few minutes for teeth to become moistened. Comb pet thoroughly with a slow grooming motion. Be sure that both tips and sides of the teeth contact the skin, inner fur, and hair. For pets with thick fur, groom by pushing back fur and combing around the roots. After use, wipe teeth gently with a dry paper towel or tissue. Store in a sealed plastic bag.

Buyer assumes all risks of use, storage or handling of this product not in strict accordance with this label.