

67505-2

7/14/2009

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

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

JUL 14 2009

Mr. Joseph E. Dyer  
ECTO Development Corporation  
1229 Jesse James Road  
Excelsior Springs, MO 64024-1186

Dear Mr. Dyer:

Subject: Amendment- response to Agency letter dated June 4, 2009  
Ecto Pour- On For Cattle  
EPA Registration Number 67505-2  
Your submission dated June 17, 2009

The application referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable with the following comments:

1. On page 2 move "Do not water the treated area to the point of run-off ... maximum of 2 feet." to the Direction for Use section. Change "2 feet" to "3 feet".

2. Change "Other than applications to building... crack-and-crevice applications, only." to read "Other than applications to building foundations, all outdoor applications to impervious surfaces such as sidewalks, driveways, patios, porches and structural surfaces (such as windows, doors, and eaves) are limited to spot and crack-and crevice applications, only.". These statements should be moved to the Directions for Use section.

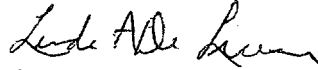
3. Under Directions for Use add "Applications is prohibited directly into sewers or drains, or to any area like a gutter where drainage to sewers, storm drains, water bodies, or aquatic habitat can occur. Do not allow this product to enter any drain during or after application.".

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

If you have any questions regarding this action, please contact Linda A. DeLuise of my team at (703) 305-5428.

Sincerely yours,



Richard Gebken  
Product Manager (13)  
Insecticide Branch  
Registration Division (7505P)

Enclosure

FRONT PANEL

ECTO POUR-ON FOR CATTLE  
(OR OTHER LIVESTOCK)

SYNERGIZED FORMULA  
CONCENTRATED INSECTICIDE  
FOR BEEF LACTATING AND DAIRY CATTLE,  
SHEEP, HORSES AND THEIR PREMISES

Can be applied topically to livestock and their premises

Controls lice, horn and face flies, and aids in the control of ticks on beef and lactating diary cattle.

Controls lice, horn, stable, deer and face flies, eye gnats and ticks on horses.

Control sheep keds and lice on sheep.

ACTIVE INGREDIENTS:

Permethrin (CAS NO.: 52645-53-1)*.....	7.40%
Piperonyl Butoxide Technical (CAS NO.: 51-03-6)**.....	7.40%
OTHER INGREDIENTS:***.....	85.20%
TOTAL	100.00%

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

\*\* Equivalent to Min. 5.92% (butylcarbityl) (6-propylpiperonyl) ether and 1.48% related compounds.

\*\*\* Contains Petroleum Distillates

KEEP OUT OF THE REACH OF CHILDREN  
CAUTION  
SEE SIDE/BACK PANEL FOR  
ADDITIONAL PRECAUTIONARY STATEMENTS  
AND DIRECTIONS FOR USE

**REMOVED  
WITH COMMENTS  
By EPA Letter Dated**  
**JUL 14 2009**  
Under the Federal Insecticide,  
Fungicide, and Rodenticide Act  
as amended, for the pesticide  
registered under EPA Reg. No.  
**67505-2**

Net Contents: 64 Fl Oz (1.8925 Liters)

EPA Reg. No.: 67505-2

Est. Reg. No.: 67517-MO-1

Manufactured For  
Ecto Development Corporation  
1229 N. Jesse James Road  
Excelsior Spring, MO 64024

SIDE/BACK PANEL

ECTO POUR-ON FOR CATTLE  
(OR OTHER LIVESTOCK)

PRECAUTIONARY STATEMENTS  
HAZARDS TO HUMANS AND DOMESTIC ANIMALS  
CAUTION

Harmful if absorbed through the skin. Avoid contact with skin, eyes, or clothing. Remove contaminated clothing and wash contaminated clothing before reuse. Wash thoroughly with soap and water after handling.

FIRST AID

If On Skin °Take off contaminated clothing.  
or Clothing °Rinse Skin immediately with plenty of water for 15-20 minutes.  
°Call a poison control center or doctor for treatment advice.

HOT LINE NUMBER

Have the product container or label with you when calling a poison control center or doctor for treatment. You may also contact 1-800-XXX-XXXX for emergency medical treatment information.

NOTE TO PHYSICIAN

Contains petroleum distillate-vomiting may cause aspiration pneumonia.

ENVIRONMENTAL HAZARDS

This pesticide is extremely toxic to fish and other aquatic invertebrates. To protect the environment do not allow pesticide to enter or run off into storm drains, drainage ditches, gutters or surface waters. Applying this product in calm weather when rain is not predicted for the next 24 hours will help to ensure that wind or rain does not blow or wash pesticide off the treatment area.

Do not water the treated area to the point of run-off.  
Do not make applications during rain.

All outdoor applications must be limited to spot and crack-and-crevice treatments only, except for the following permitted uses.

- (1) Treatment to soil or vegetation around structures
- (2) Applications to lawns, turf, and other vegetation.
- (3) Applications to building foundations, up to a maximum height of 2 feet.

Other than applications to building foundations, all outdoor applications to impervious surfaces (such as windows, doors, and eaves) are limited to spot and crack-and-crevice applications, only.

PHYSICAL AND CHEMICAL HAZARDS

Do not use or store near heat or open flame. KEEP CONTAINER SEALED WHEN NOT IN USE.

SIDE/BACK PANEL

ECTO POUR-ON FOR CATTLE  
(OR OTHER LIVESTOCK)  
DIRECTION FOR USE (CONTINUED)

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APPLY TO HORSES AND FOALS

Target Pests:

Stable Flies, Deer Flies, Horn Flies, Face Flies, House Flies, Eye Gnats, Lice and Ticks, Aids in control of Horse Flies, Mosquitoes and Black Flies.

Application Instructions:

Pour-On: Do not use this application method on foals. After riding or exercise, pour 8 mL to 16 mL per animal along back and down the face of **MATURE** horses, being careful to avoid the eyes. Repeat treatment as needed, but not more than once every two weeks.

Wipe-On: Apply 8 mL to 16 mL. Dampen an applicator mitt, cloth or towelling (turkish). Rub over hair with special attention to the legs, shoulders, neck and facial areas where flies tend to congregate. Avoid the eyes. Repeat treatment as needed, but not more than once every two weeks.

Ready to Use Spray: Use after riding or exercising. Apply 8 mL to 16 mL undiluted in a mist sprayer per animal. Apply directly to ticks. Repeat treatment as needed, but not more than once every two weeks.

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APPLY TO SHEEP AND LAMBS

Target Pests:

Sheep Keds and Lice

Application Instructions:

Pour-On: Pour along the back. Apply 1 mL per 50 lbs body weight of animal, up to maximum of 12 mL for any one animal. For optimum control, all animals in the flock should be treated after shearing. Repeat treatment as needed, but not more than once every two weeks. For optimum lice control, two treatments at a 14 day interval are recommended.

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SIDE/BACK PANEL

ECTO POUR-ON FOR CATTLE  
(OR OTHER LIVESTOCK)  
DIRECTION FOR USE (CONTINUED)

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APPLY TO HORSES, BEEF, DAIRY, SWINE, SHEEP AND POULTRY PREMISES,  
ANIMAL HOSPITAL PENS AND KENNELS AND "OUTSIDE" MEAT PROCESSING PREMISES

Target Pests:

House Flies, Stable Flies, Face Flies, Gnats, Mosquitoes, Black Flies, Fleas,  
Little House Flies (Fannia spp.). Aids in control of Cockroaches, Ants, Spiders  
and Crickets.

Application Instructions:

Ready-To Use Spot or Premise Spray:

Use undiluted in a mist sprayer. Apply directly to surface to leave a  
residual insecticide coating, paying particular attention to areas where  
insects crawl or alight. 500 mL will treat approximately 7,200 square feet.

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STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Storage: Keep container sealed when not in use. Do not store near heat or open  
flame.

Pesticide Disposal: Waste resulting from the use of this product may be  
disposed of on site or at an approved waste disposal  
facility.

Container Disposal: Triple rinse (or equivalent). Then offer for  
recycling or reconditioning, or puncture and  
dispose of in a sanitary landfill or incineration,  
or, if allowed by State and local authorities,  
by burning. If burned stay out of smoke.

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NOTICE OF WARRANTY

ECTO DEVELOPMENT CORPORATION MAKES NO WARRANTY OF MERCHANTABILITY, FITNESS FOR  
ANY PARTICULAR PURPOSE, OR OTHERWISE, EXPRESSED OR IMPLIED CONCERNING THIS  
PRODUCT OR ITS USES WHICH EXTEND BEYOND THE USE OF THE PRODUCT UNDER NORMAL  
CONDITIONS IN ACCORD WITH THE STATEMENTS MADE ON THIS LABEL.