7 MAR 1996

Joseph E. Dyer PM Resources, Inc. 13001 St. Charles Rock Road Bridgeton, MO 63044

Dear Mr. Dyer:

Subject: Response to Dipropyl Isocinchomeronate DCI and

Amended Labeling Rub-On Horse Insecticide

EPA Registration Number 67515-5

Submissions Dated September 28, 1994 and

December 30, 1995

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. Link via a footnote the statement "Contains petroleum distillates" to the Inert Ingredients declaration.
- 2. Revise the Precautionary Statement to read as follows:

Harmful if swallowed. May be absorbed through skin. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling.

3. Revise the "IF SWALLOWED" Statement of Practical Treatment to read as follows:

"Call a doctor or get medical attention. Do not induce vomiting. Do not give anything by mouth to an unconscious person. Avoid alcohol."

4. Since this product is only sold in 32 ounce containers, the Pesticide Disposal and Container Disposal statement should be combined to read as follows:

"Wrap in several layers of newspaper and discard in trash."

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

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)

FRONT PANEL

ACCURTED WITH CONTROLL Dated

MAR 1996

RUB-ON HORSE INSECTICIDE

HORSES (NOT FOR SLAUGHTER)

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KILLS AND REPELS

Horse Flies, Stable Flies, Horn Flies, House Flies, Deer Flies, Mosquitoes, and Gnats.

Aids in Grooming

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ACTIVE INGREDIENTS:

Pyrethrins	0.10%
*Piperonyl butoxide, technical	
**Di-n-propyl isocinchomeronate	0.70%
***N-octyl bicycloheptene dicarboximide	0.35%
INERT INGREDIENTS:	
	TOTAL 100.00%

Contains petroleum distillates

- *Consists of 0.16% (Butylcarbityl)(6-Propylpiperonyl) Ether and 0.04% of related compounds
- **MGK Repellent 326 U.S. Pat. No. 2,757,120
- ***MGK Insecticide Synergist U.S. Pat. No. 2,576,512

KEEP OUT OF REACH OF CHILDREN

CAUTION

SEE SIDE/BACK PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

EPA Reg. No.: 67517-5

NET CONTENTS: 32 fl. oz. (946 ml)

EPA Est. No.: 67517-MO-1

Manufactured By
PM RESOURCES, INC.
13001 St. Charles Rock Road
Bridgeton, MO 63044

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SIDE BACK PANEL

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS CAUTION

Harmful if swallowed. May be absorbed through skin. Avoid contact with skin, eyes or clothing. Wash thoroughly after handling and before eating or smoking. Do not use on humans.

STATEMENT OF PRACTICAL TREATMENT

If Swallowed: Call a physician or Poison Control Center. Drink 1 or 2 glasses of water and induce

vomiting by touching the back of the throat with finger. Do not induce vomiting or give

anything by mouth to an unconscious person.

If On Skin: Wash with plenty of soap and water. Get medical attention if irritation persists.

If In Eyes: Flush eyes with plenty of water. Call a physician if irritation persists.

If Inhaled: Remove victim to fresh air. If not breathing apply artificial respiration, preferably

mouth-to-mouth. Get medical attention.

ENVIRONMENTAL HAZARDS

This product is toxic to fish, birds and other wildlife. Do not apply directly to water. Do not contaminate water when disposing of equipment washwaters or rinsate.

DIRECTIONS FOR USE

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

Rub-On Horse Insecticide contains a combination of insecticides and fly repellents in a blend of fine grooming oils. When applied as directed, horse flies, stable flies, horn flies, house flies, deer flies, mosquitoes, or gnats are repelled or killed. Flies not repelled stop biting and soon drop to the ground and die.

Apply with a cloth which is slightly moistened with the product. Use 1 to 2 ounces of Rub-Gn Horse Insecticide per animal each day for a 3-day period. Repeat after 2 days have elapsed and every second day thereafter or when insects again disturb the animal. Briskly rub cloth against growth of hair on legs, shanks, belly, shoulders, neck and facial area.

COLTS: Treat very lightly once a day instead of attempting to build up a residual repellency by a eating more heavily.

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SIDE BACK PANEL

DIRECTIONS FOR USE (Continued)

For best fly protection, apply during morning hours; for mosquitoes apply early in evening. Dusty animals should be brushed before applying Rub-On Horse Insecticide.

Keep cloth in closed metal container between treatment periods.

STORAGE AND DISPOSAL

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

Pesticide Storage: Do not store near heat or open flame.

Pesticide Disposal: Wastes 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.

NOTICE OF WARRANTY

PM RESOURCES, INC. 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.