

67572-12

04-26-2004

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



OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

April 26, 2004

Contract Packaging, Inc.
c/o RegWest Company
30855 Rocky Road
Greeley, Co 80631-9375

300/ 5-759058

Attention: Ms. Kim Davis

Subject R&M Dog & Cat Repellent Spray #1
EPA Reg. No. 67572-12
Your submission of March 30, 2004
Revised Label

Purpose The purpose of your submission is to submit revised labeling for our review for the basic product and a distributor product.

Basic label The labeling submitted with the above letter, under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) is acceptable, provided you submit one (1) copy of final printed labeling to us, before you ship your product. A copy of the stamped label is enclosed for your records.

Existing stocks Stocks of existing labels may be used for eighteen (18) months.

Distributor label Normally, we do not review distributor labels. However, because we will never see a final printed label from the basic registrant and because this distributor label contains many obvious label violations, we have decided to review it.

Make the following changes to the distributor label which must be identical to the basic product label in all respects except for product name, company name and address, and registration number:

1. On the Front Panel, the graphic of the dog and cat running away in fear must be toned down. We have no data to support such a violent reaction to this product.

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Distributor label-continued

- 2. Chose a different color combination than black on green which violates the requirement for clear, readable text.
- 3. Insure that your label meets the minimum type size requirements for final printed labels, especially the ingredient statement. See the enclosure on this topic.
- 4. On the Back Panel, follow the formatting suggestions on the basic product.

Since this product is marketed in a 16 oz can, you will not have a problem in fitting in all the text in a easily read format. . If you try to market this distributor product under this version, it could be cited for several labeling violations.

Questions

If you have questions about this letter, please contact me at 703-305-5407 (by phone), 703-305-6596 (by fax), or peacock.dan@epa.gov (by E-Mail).

Sincerely yours,



Daniel B. Peacock, Biologist
Insecticide-Rodenticide Branch
Registration Division (7504C)

Enclosure

- 1. Stamped label
- 2. Minimum Type Sizes for Final Printed Labels

Letter location

Disk 144:A:\MNK\67572-12, revised label, final printed distributor label,4-20-2004.wpd,

R & M Dog & Cat Repellent Spray #1

**Indoor and Outdoor
Indoor and Outdoor Dog & Cat Repellent
A Non-Pressurized Pump Spray to Repel and Train Dogs and Cats
A training aid for your own pet.**

**Will repel dogs and cats for up to 24 hours when applied daily.
Keeps pets away from furniture, carpets, trees, garbage cans/bags and other "forbidden areas."**

Active Ingredients:	
Methyl Nonyl Ketone (CAS No. 122-12-9)	1.9%
Related compounds	0.1%
Other Ingredients	98.0%
Total	100.0%

**Keep Out of Reach of Children
WARNING**

See back panel for additional precautionary statements.
[See back panel for precautionary statements.]

EPA Reg. No. 67572-12

EPA Est. 67572-GA-1

Manufactured by
[This is another quality product distributed by:]
Contract Packaging, Inc.
10115 Highway 142 North
Covington, GA 30014

ACCEPTED

APR 26 2004

Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under
EPA Reg. No. 67572-12

Net Contents: _____ fl. oz. (

{Back Panel}

[This product will repel dogs and cats from furniture, carpet, trees, garbage cans/bags and other forbidden areas for up to 24 hours when applied daily.]

DIRECTIONS FOR USE

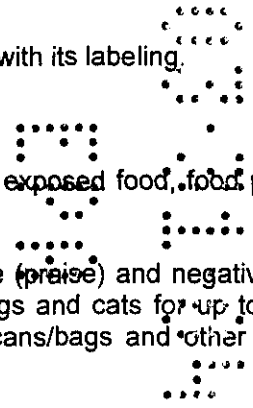
It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

SHAKE WELL BEFORE USING

Use Restrictions

Do not use in commercial food processing or preparation areas. In the home, cover all exposed food, food processing surfaces and utensils during treatment. Do not spray food or feed crops.

For both indoor and outdoor situations use training whenever possible, including positive (praise) and negative (sharply spoken word backed up with disciplinary action) reinforcement. This product repels dogs and cats for up to 24 hours when applied daily. Keeps pets away from furniture, carpet, trees, shrubs, garbage cans/bags and other "forbidden areas."



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Indoor Use

Use indoors to break your pet of undesirable habits such as sleeping on furniture and rugs or to keep out of forbidden areas. Always use with consistent training. Praise your pet for good behavior and scold for bad behavior.

Pretreatment Directions: Before spraying large areas of rugs, fabrics or plastics, test the effect of this product by treating a small, inconspicuous area. This product may stain or soften some fabrics or plastics. To avoid possible damage, lightly spray a piece of cloth and place it on the object or area to be protected.

Application Directions: Lightly spray the object to be protected with this product until slightly moistened.

Retreatment Directions: Repeat daily, or as necessary, until undesirable habit is broken.

Outdoor Use

Use outdoors to prevent dogs and cats from disturbing flowerbeds, lawn areas, trees, shrubbery, fences, patio furniture and garbage cans/bags.

Note: This product is not likely to break the established urination patterns of dogs unless it is used as a training aid.

Pretreatment Directions: Stray animals are frequently attracted to areas that pets have soiled with feces or urine. To discourage repeat visits, remove any droppings and clean area with water.

Application Directions: Do not apply directly to foliage of shrubs or to ornamental, soft-bodied plants. Do not apply to food or feed crops. Lightly spray surrounding soil or apply to a piece of cloth and affix near area to be protected.

Retreatment Directions: Repeat daily, or as necessary, until undesirable habit is broken.

Storage and Disposal

Storage: Keep in a cool, dry place inaccessible to children and pets. Keep container tightly closed to prevent evaporation. Store above 32°F. If frozen, completely thaw and stir well before using. **Disposal: Empty containers:** Do not reuse this container. Place in trash or offer for recycling, if available. **Partly filled containers:** Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Do not place unused product down any indoor or outdoor drain.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

WARNING: Causes substantial but temporary eye injury. Harmful if absorbed through skin or inhaled. Do not get in eyes or on clothing. Avoid breathing spray mist. Wear goggles or face shield. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

First Aid

If in Eyes	<ul style="list-style-type: none"> • 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.
If on Skin or Clothing	<ul style="list-style-type: none"> • Take off contaminated clothing. • Immediately rinse skin with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
If Inhaled	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. • Call a poison control center or doctor for further treatment advice.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-222-1222 for emergency medical treatment information. [In case of emergency or for product information call {phone number} 9AM-5PM EST, Monday through Friday.]

{Note: The First Aid statements' grid format will be used if market label space permits; otherwise a paragraph format will be used.}

Physical or Chemical Hazards

Flammable. Keep away from heat and open flame.

[Item No. _____]

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

To obtain additional information or in case of an emergency call 770-787-1977.

[] Denotes alternate/optional language

{ } Denotes language that does not appear on the market labeling