

Adams Technology Systems
5145 Forest Run Trace Suite B
Alpharetta GA 30022-4504

APR 12 2005

Dear Ms Hartis:

Subject: Label Revisions

Product Name: Davis Pyrethrins

EPA Registration No. 69061-1

Application date: January 31, 2005

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, is acceptable subject to the comments listed below:

1) Revise the following statement to read:

a) In the **"IF IN EYES"** section the third line should read:

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

b) Revise the **IF SWALLOWED** section to read:

- o Call poison control center or doctor immediately for treatment advice.
- o Have person sip a glass of water if able to swallow.
- o Do not induce vomiting unless told to do so by the poison control center or doctor.
- o Do not give by mouth to an unconscious person.

c) In the **IF on SKIN or CLOTHING** section the third line should read:

- o Call a poison control center or doctor for treatment advice.

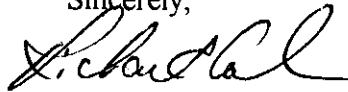
Pg 2 EPA Reg. No. 69061-1

2) Add the statement "**Contains Petroleum Distillate - vomiting may cause aspiration pneumonia**".

Enclosed is a copy of your label stamped "**Accepted with Comments**". Submit four (4) copies of the final printed labeling before you release the product for shipment.

If you have questions regarding this letter, please contact Ms. Pat Quarles @ (703) 305-6876.

Sincerely,



Richard Gebken
Product Manager 10
Insecticide Branch
Registration Division 7505

enclosure

Label: 200% actual size

PRECAUTIONARY STATEMENTS
Hazards to Humans and Domestic Animals

CAUTION

HUMANS: Harmful if swallowed. Do not get in eyes. Wash hands thoroughly after each use and before eating or smoking.
ANIMALS: Do not apply directly to or on eyes, mouth, or genitalia of pets. Do not use on puppies or kittens under 12 weeks. Consult a veterinarian before using this product on debilitated, aged, pregnant, nursing animals, or animals on medication. Sensitivities may occur after using ANY pesticide product for pets. If signs of sensitivity occur, bathe your pet with mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately.

FIRST AID

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.

IF SWALLOWED: Have a person sip a glass of water if swallowed. Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact the International Poison Center at 1-888-740-8712.

ENVIRONMENTAL HAZARDS: This product is toxic to fish. Do not dispose of in lakes, streams, or open ponds.

PHYSICAL OR CHEMICAL HAZARDS: Do not use or store near heat or an open flame.

Buyer assumes all risks of use, storage or handling of this material not in strict accordance with the directions given here with.



**A concentrate to be added to shampoo
for use on dogs & cats to kill fleas & ticks**

ACTIVE INGREDIENTS:

Pyrethrins.....	7.5%
Piperonyl Butoxide, Technical*.....	75.0%
OTHER INGREDIENTS:	17.5%
Total: 100.0%	

**Equivalent to minimum 60% (butylcarbityl) (6-propylpiperonyl) ether and 15% related compounds. Contains petroleum distillate.*

KEEP OUT OF REACH OF CHILDREN

CAUTION

See Side Panel For Precautionary Statements
EPA EST. NO. 50591-GA-1 EPA REG. NO. 69061-1
NET CONTENTS: 5 Fl. Oz. (147.8 ml)

DIRECTIONS FOR USE

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

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

To be applied only by or under the supervision of a licensed veterinarian or pet groomer.

TO SHAMPOO AND KILL FLEAS & TICKS, follow these steps:

- 1) Mix 1 oz. of Davis Pyrethrins™ in one gallon of non-insecticide shampoo.
- 2) Wet animal thoroughly.
- 3) Apply a generous amount of shampoo mixture to the coat, massaging the lather well into the coat and skin.
- 4) Allow the lather to remain on animal for five minutes to permit pyrethrins to take full effect.
- 5) Rinse animal thoroughly.

STORAGE AND DISPOSAL

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

Storage: Store in a cool, dry area, away from heat or open flame. **If empty:** Do not reuse this container. Place in trash or offer for recycling if available.

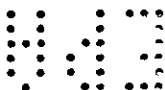
If partly filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

Manufactured By:

Davis Manufacturing

541 Proctor Avenue • Atlanta/Scottsdale, GA 30079
800-292-2424 • www.davismfg.com

Product No. DP05 ESL080289 REV013105



Background PMS: 877 Name PMS: 186

**ACCEPTED
with COMMENTS
In EPA Letter Dated:**

APR 12 2005

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

09061-1