

73510-3

07/14/2003

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

JUL 14 2003

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

MarketQuest, Inc.
c/o Mr. Lain Weatherston, Ph.D.
Technology Sciences Group Inc.
4061 North 156th Drive
Goodyear, AZ 85338

Subject: Amendment Adding Claims for Mosquitoes and Ticks
MQHP-1
EPA Registration Number: 73510-3
Your Submission, Dated April 30, 2003

Dear Dr. Weatherston:

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 comment listed below. Two copies of the finished labeling must be submitted prior to releasing the product for shipment. A stamped copy of the label is enclosed for your records.

1. The claims for ticks are not supported by available data. EPA has data to show that a 45% permethrin spot-on product will kill and repel ticks when applied at 9 cc. per horse; however, available data do not demonstrate conclusively that a 45% product applied at only 6 cc. per horse will kill or repel ticks. You must either delete the claims for ticks or agree to submit/cite efficacy data which support these claims.

NOTE: Since EPA has data on file demonstrating the effectiveness of 45% permethrin products for tick control when applied at 9 cc. per horse, you may retain the tick claims, provided you increase the application rate to 9 cc. per horse. If you choose this option, please submit revised draft labeling incorporating this change and required data compensation forms (i.e., Certification with Respect to Citation of Data/Data Matrix).

**MQHP-1
SPOT-ON**

BITING FLY PROTECTION

- KILLS AND REPELS HORN FLIES, FACE FLIES, STABLE FLIES, HORSE FLIES, DEER FILES, BLACK FLIES, HOUSE FLIES, GNATS AND MOSQUITOES FOR UP TO 2 WEEKS
- KILLS AND REPELS BITING AND NUISANCE FLIES FOR UP TO 2 WEEKS
- KILLS AND REPELS MOSQUITOES FOR UP TO 2 WEEKS
- KILLS AND REPELS TICKS ON HORSES
- PROTECTS HORSES FROM HORN FLIES, FACE FLIES, STABLE FLIES, HORSE FLIES, DEER FILES, BLACK FLIES, HOUSE FLIES, GNATS AND MOSQUITOES FOR UP TO 2 WEEKS
- PROTECTS HORSES FROM NUISANCE AND BITING FLIES FOR UP TO 2 WEEKS
- PROTECTS HORSES FROM MOSQUITOES FOR UP TO 2 WEEKS
- PROTECTS HORSES FROM TICKS
- ONE DOSE LASTS UP TO 2 WEEKS
- ONE MONTH [TWO, THREE, FOUR MONTH] SUPPLY

FOR USE ON HORSES ONLY
NOT FOR USE ON FOALS UNDER THREE [3] MONTHS OF AGE

ACTIVE INGREDIENT	
PERMETHRIN* [CAS# 52645-53-1]	45.00%
OTHER INGREDIENT	55.00%
TOTAL	100.00% [w/w]

**ACCEPTED
with COMMENTS
In EPA Letter Dated:
JUL 14 2003**

**Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
73510-3**

* Cis/trans ratio: max 55%[±] cis and min 45%[±] trans

KEEP OUT OF REACH OF CHILDREN

CAUTION

SEE BACK PANEL FOR PRECAUTIONARY STATEMENTS
READ ALL DIRECTIONS BEFORE USING THIS PRODUCT

MarketQuest Inc.
746 Walker Road, Suite 10-301
Great Falls, VA 22066

EPA Registration No. 73510 - 3

EPA Establishment No. ????

- NET CONTENTS: 2 x 6 cc applicators
- NET CONTENTS: 4 x 6 cc applicators
- NET CONTENTS: 6 x 6 cc applicators
- NET CONTENTS: 8 x 6 cc applicators

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

CAUTION

Harmful if swallowed or absorbed through the skin. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling.

FIRST AID

IF SWALLOWED:

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

IF ON SKIN OR CLOTHING:

Take off contaminated clothing. Rinse skin immediately with plenty of water for 15 to 20 minutes. Call a poison control center or doctor for treatment advice.

IF IN EYES:

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

HOT LINE NUMBER:

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 Control Center at 1-877-757-4943

ENVIRONMENTAL HAZARDS

This product is extremely toxic to fish. Do not apply directly to water, or areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when cleaning equipment or disposing of equipment washwaters.

CHEMICAL HAZARDS

Combustible. Do not use or store near heat or open flame

STORAGE AND DISPOSAL STATEMENTS

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

PESTICIDE STORAGE: Store in a cool, dry place. Protect from freezing.

PESTICIDE DISPOSAL: Call your local solid waste agency or [1-800-CLEANUP or equivalent organization] for disposal instructions. Unless otherwise instructed place in trash. Never pour unused product down the drain or on the ground.

CONTAINER DISPOSAL: Do not reuse empty container. Place in trash.

DIRECTIONS FOR USE

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

Do not use on horses intended for slaughter

Sensitivities can occur after using ANY pesticide product for animals. If signs of sensitivity occur wash area with mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately. Not for use on foals under three [3] months of age

Ready to use, no dilution necessary

Hold tube in upright position, pointing away from user's face and body. Break off tip or cut with scissors. Using the cc guide marks on the tube apply MQHP-1 as follows:

- 1] streak 1 cc on top of the croup.
- 2] streak 1 cc on the forehead under the forelock; taking care to avoid the eyes and mucous membranes
- 3] spot 1 cc over the dorsum of the carpus (front of knee) of each front leg [2 cc total]
- 4] spot 1 cc over the plantar surface of the tarsus (behind the hock) of each hind leg [2 cc in total]

Place empty applicator in trash

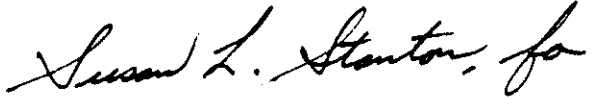
Do not reapply for 14 days.

WARRANTY

MarketQuest Inc., warrants that this product conforms to the chemical description on the label. MarketQuest Inc., neither makes nor authorizes any agent or representative to make, any other warranty of fitness or of merchantability, guarantee or representation, express or implied, concerning this material. MarketQuest Inc's maximum liability for breach of this warranty shall not exceed the purchase price of this product. Buyer and user acknowledge and assume all risks and liabilities resulting from the handling, storage and use of this material which extend beyond the use of the product under normal conditions in accord with statements made on this label.

If you have any questions regarding this action, please contact Susan Stanton of my team at (703) 305-5218.

Sincerely,

A handwritten signature in black ink that reads "Susan L. Stanton, fa". The signature is written in a cursive style with a large, sweeping "S" and a distinct "fa" at the end.

George T. LaRocca
Product Manager 13
Insecticide Branch
Registration Division (7505C)

Enclosure