

75257-1

6-12-2007

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

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

**JUN 12 2007**

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Iain Weatherston  
Senior Regulatory Consultant  
Star Business Products, Inc.  
115 Green View Drive  
Madison, MS 39110

**SUBJECT:** Application for Pesticide Notification – Adding U. S. Standard Units  
Freedom® 45 for Dogs  
EPA Reg. No. 75257-1  
Application Dated May 3, 2007

Dear Mr. Weatherston:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the actions requested fall within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions, please call me directly at 703-305-6249 or Terri Stowe of my staff at 703-305-6117.

Sincerely,

A handwritten signature in black ink, appearing to read "Linda Arrington".

Linda Arrington  
Notifications & Minor Formulations Team Leader  
Registration Division (7505P)  
Office of Pesticide Programs

Copied to K. O'Malley 5/17/07

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Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060. Approval expires 2-28-95



United States  
Environmental Protection Agency  
Washington, DC 20460

<input type="checkbox"/>	Registration
<input type="checkbox"/>	Amendment
<input checked="" type="checkbox"/>	Other

OPP Identifier Number

### Application for Pesticide - Section I

1. Company/Product Number 75257-1	2. EPA Product Manager George LaRocca	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Star Business Products / Freedom 45 for Dogs	PM# 13	
5. Name and Address of Applicant (Include ZIP Code) Star Business Products Inc. 115 Green View Drive, Madison, MS 39110 <input checked="" type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

### Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____	<b>NOTIFICATION</b>  JUN 12 2007
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.	
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.	

**Explanation:** Use additional page(s) if necessary. (For section I and Section II.)

To add US standard units (fl oz) to the net contents statement which currently only has metric units (cc)

This notification is consistent with the provisions of PRN 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or confidential statement of formula of this product. I understand that it is a violation of 19 U.S.C. Sec. 1001 to wilfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PRN 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA

### Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	<input type="checkbox"/> Plastic
				<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt. No. per container	Other (Specify) _____	
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			Other _____		

### Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Iain Weatherston		Title Senior Regulatory Consultant		Telephone No. (Include Area Code) 623-535-4060	
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment both under applicable law.					6. Date Application Received  (Stamped)
2. Signature 		3. Title Senior Regulatory Consultant			
4. Typed Name Iain Weatherston		5. Date May 3, 2007			

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FRONT PANEL

NOTIFICATION

JUN 12 2007

# FREEDOM® 45 FOR DOGS

[ Cat/slash icon ]

For use on dogs and puppies over twelve weeks of age

**DO NOT USE ON CATS**

Kills, repels and prevents re-infestation of fleas for up to 5 weeks  
Kills, repels and prevents re-infestation of ticks for up to 6 weeks  
Kills and repels mosquitoes, lice and mites on dogs for up to 4 weeks

ACTIVE INGREDIENT	
Permethrin* [CAS# 52645-53-1] .....	45.00%
OTHER INGREDIENT .....	55.00%
	TOTAL 100.00%

\* 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

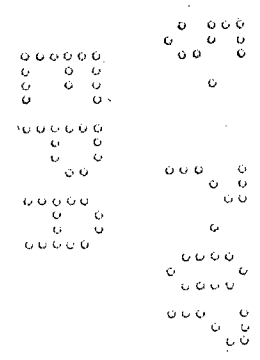
Star Business Products, Inc..  
115 Green View Drive  
Madison, MS 39110

EPA Registration No.75257-1  
EPA Establishment No.

Package contains a two [2], three [3],  
four [4], twelve [12] months supply.  
(as applicable)

NET CONTENTS

3 x 0.50 fl oz (3 x 1½ cc applicators)  
3 x 0.10 fl oz (3 x 3 cc applicators)  
3 x 0.20 fl oz (3 x 6 cc applicators)  
12 x 0.50 fl oz (12 x 1½ cc applicators)



PRECAUTIONARY STATEMENTS  
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

**Hazards to Humans:** 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 and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before re-use. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

**Hazards to Domestic Animals:** Consult a veterinarian before using this product on debilitated, aged or medicated animals. Consult a veterinarian before using on dogs with known organ dysfunction. Sensitivities can occur after using ANY pesticide product for animals. If signs of sensitivity occur, discontinue use, bathe your pet with mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately.

**DO NOT USE ON CATS.**  
May be toxic and potentially fatal if applied to, or ingested by cats. **Cats which actively groom or engage in close physical contact with recently treated dogs may be at risk of serious harmful effects.**

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 - 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 - 20 minutes.
- Remove contact lenses, if present, after first 5 minutes, then continue rinsing eyes.
- Call a poison control center or doctor for treatment advice.

HOT LINE NUMBER:

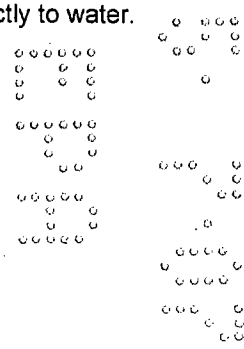
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact the Rocky Mountain Poison Control at 1-303-595-4869.

ENVIRONMENTAL HAZARDS

This product is extremely toxic to fish and other aquatic organisms. Do not apply directly to water.

CHEMICAL HAZARDS

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: If empty: Do not reuse this container. Place in trash or offer for recycling if available.  
If partially filled: Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

**DIRECTIONS FOR USE**

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

**DO NOT USE ON CATS**

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 marks on the body of the applicator as a guide apply **FREEDOM 45 FOR DOGS** as follows by gently squeezing the applicator.
- Part dog's hair between the shoulder blades.
- Apply the recommended amount of solution to the skin on the dog's back between the shoulder blades. For large and extra-large dogs, application of the solution to the skin directly in front of the base of the dog's tail is also required. **SEE RECOMMENDED DOSING GUIDELINES BELOW.**

Package for dogs weighing 33 lbs or less

Apply 1.5 cc of **FREEDOM 45 FOR DOGS** to the skin of the dog's back between the shoulder blades.

Package for dogs weighing 33 - 66 lbs

Apply 1.5 cc of **FREEDOM 45 FOR DOGS** to the skin of the dog's back between the shoulder blades and 1.5 cc to the skin directly in front of the base of the dog's tail.

Package for dogs weighing more than 66 lbs

Apply 3.0 cc of **FREEDOM 45 FOR DOGS** to the skin of the dog's back between the shoulder blades and 3.0 cc to the skin directly in front of the base of the dog's tail.

Multi package

For dogs weighing 33 lbs or less

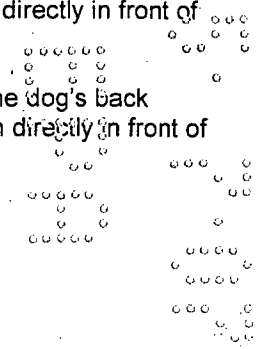
Apply 1.5 cc of **FREEDOM 45 FOR DOGS** ( 1 tube) to the skin of the dog's back between the shoulder blades.

For dogs weighing 33 - 66 lbs

Apply 1.5 cc of **FREEDOM 45 FOR DOGS** ( 1 tube) to the skin of the dog's back between the shoulder blades and 1.5 cc (a second tube) to the skin directly in front of the base of the dog's tail.

For dogs weighing more than 66 lbs

Apply 3.0 cc of **FREEDOM 45 FOR DOGS** ( 2 tubes) to the skin of the dog's back between the shoulder blades and 3.0 cc (another 2 tubes) to the skin directly in front of the base of the dog's tail.



**WARRANTY**

Star Business Products, Inc., warrants that this product conforms to the chemical description on the label. Star Business Products, Inc., neither makes nor authorizes any agent or representative to make any other warranty or fitness or merchantability, guarantee or representation, express or implied, concerning this material. Star Business Products, 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 product which extend beyond the use of the product under normal conditions and in accord with statements made on the label.

**APPLICATOR TUBE**

Front tube panel text: FREEDOM 45 FOR DOGS  
PERMETHRIN INSECTICIDE 45%  
DO NOT USE ON CATS or CAT/SLASH ICON

Back tube panel text: KEEP OUT OF REACH OF CHILDREN  
Read entire label before each use.

