

80917-4

3-11-2008

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

MAR 11 2008

Technology Science Group Inc.  
c/o Amy Plato Roberts  
1150 18<sup>th</sup> St, NW.  
Washington, DC 20036

Subject: Product Name: Shake Way Critters Repellent Granules  
EPA Reg. No: 80917-4  
Application for label Notification dated February 7, 2008 to add alternant brand name "Shake-Away Fox Urine Granules" and add marketing text in the form table to list the three Shake-Away Products.

Dear Mrs. Roberts:

The Biopesticides and Pollution Prevention Division is in receipt of your application for Notification under 98-10 dated above. A preliminary screen of this request has been conducted for its applicability under PRN 98-10 and it has been determined that the action(s) requested falls within the scope of PRN 98-10. Our records have been duly noted, and the label submitted with this application has been stamped "Notification, received and reviewed" and will be placed accordingly in our records.

Questions concerning this action should be directed to Mr. Raderrio Wilkins at (703) 308-1259 or email at wilkins.raderrio@epa.gov.

Sincerely,

*Linda Hollis*

Linda Hollis, Chief  
Biochemical Pesticides Branch  
Biopesticides and Pollution Prevention Division



United States  
**Environmental Protection Agency**  
 Washington, DC 20460

Registration  
 Amendment  
 Other

OPP Identifier Number

**Application for Pesticide - Section I**

1. Company/Product Number 8091-4	2. EPA Product Manager Linda Hollis	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Shake-Away Critter Repellent Granules		PM# 91/Biochemical Pesticides Br/BPPD
5. Name and Address of Applicant (Include ZIP Code) Shake-Away 2330 Whitney Avenue Hamden, CT 06518 <input 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 _____
<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.)

NOTIFICATION to add an alternate brand name and marketing text. See attached cover letter dated February 7, 2008 for details.

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula for this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 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	* Certification must be submitted		<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
	If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt. No. per container			
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> on container label	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

**Section - IV**

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Amy Plato Roberts / aroberts@tsgusa.com	Title Regulatory Consultant	Telephone No. (Include Area Code) (202) 828-8964
<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 Regulatory Consultant	
4. Typed Name Amy Plato Roberts	5. Date February 7, 2008	

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**WASHINGTON**

1150 18th Street, N.W.  
Suite 1000  
Washington, D.C. 20036  
Telephone 202 223-4392  
Fax 202 872-0745

February 7, 2008

Linda Hollis  
Chief, Biochemical Pesticides Branch  
Biopesticides and Pollution Prevention Division (7511P)  
Office of Pesticide Programs, EPA  
One Potomac Yard, 2777 South Crystal Drive  
Arlington, VA 22202

**RE: Shake-Away® Critter Repellent Granules  
EPA Reg. No. 80917-4**

**NOTIFICATION to add an alternate brand name and add marketing text  
per PRN 98-10**

**SACRAMENTO**

712 Fifth Street  
Suite A  
Davis, CA 95616  
Telephone 530 757-1298  
Fax 530 757-1299

Dear Ms. Hollis:

Enclosed with this letter you will find the following in support of a notification to add alternate brand names for the above referenced product:

- 1) Notification form;
- 2) One (1) copy of the revised label with the alternate brand names highlighted in redline.

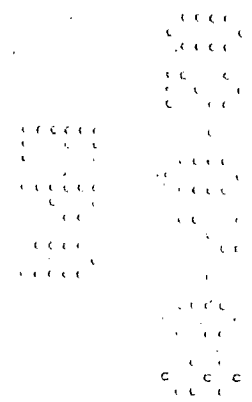
This label notification is to make the following label changes:

- a. Add the alternate brand name "Shake-Away® Fox Urine Granules."
- b. Add marketing text in the form of a table that lists the three Shake-Away animal repellent products that are available. The table provides the product name, EPA Registration Number and labeled pests.

There are no other changes made to the label at this time. If you have any questions or comments, please do not hesitate to let me know.

Sincerely,

Amy Plato Roberts  
Regulatory Consultant for Shake-Away  
Direct dial: (202) 828-8964; Email: [aroberts@tsgusa.com](mailto:aroberts@tsgusa.com)



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Text pesticide label without graphics, pictures or illustrations

# Shake-Away® Critter Repellent Granules

(Alternate Brand Name: Shake-Away® Fox Urine Granules)

<b>Active Ingredient:</b>	
Fox Urine .....	5.00%
<b>Other Ingredients:</b> .....	<u>95.00%</u>
<b>Total:</b>	100.00%

REGISTRATION  
 Reviewed: 3/6/08  
 Approved By: [Signature]

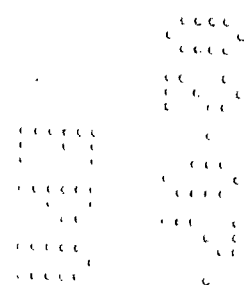
**Keep Out of Reach of Children  
CAUTION**

See (back panel) (insert label) (insert instructions) for (additional) Precautionary Statements and Directions for Use.

EPA Reg. No.: 80917-4  
EPA Est. No.:

Net Contents: XX oz. (XX grams).

Manufactured by:  
Shake-Away  
2330 Whitney Avenue  
Hamden, CT 06518  
[www.shake-away.com](http://www.shake-away.com)  
toll-free: 1-800-517-9207



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<b>FIRST AID</b>	
<b>If swallowed</b>	<ul style="list-style-type: none"> <li>• Call poison control center or doctor immediately for treatment advice.</li> <li>• Have person sip a glass of water if able to swallow.</li> <li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
<b>If on skin or clothing</b>	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15 – 20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>If in eyes</b>	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15 – 20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<p>Have the product container or label with you when calling a poison control center or doctor, or going for treatment. (In the U.S.) You may also contact 1-800-222-1222 for emergency medical treatment information.</p>	

**PRECAUTIONARY STATEMENTS**

**Hazards to Humans and Domestic Animals. Caution:** Harmful if swallowed. Avoid contact of mouth, skin, or eyes. Wash hands before eating, drinking, chewing gum, using tobacco or using bathroom facilities.

**DIRECTIONS FOR USE**

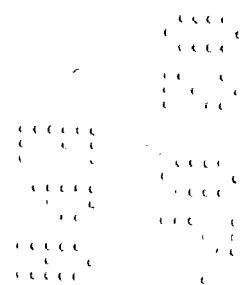
It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

**General:**

Animals use urine to communicate in the wild. When they repeatedly smell a predator's odor, animals conclude it's a "dangerous" place and choose instead to move elsewhere. Shake-Away® Critter Repellent Granules uses the same laws of nature to protect your yard and garden. Shake-Away® Critter Repellent Granules creates the illusion that foxes are present in your lawn or garden.

Use Shake-Away® Critter Repellent Granules to repel:

- Gophers
- Groundhogs
- Possums
- Porcupines
- Rabbits
- Woodchucks



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**Application Directions:**

**Use Restrictions** – This product is not for direct application to plants intended for human consumption (i.e. food plants). Apply only to the perimeter of where food plants are grown. To create a repellent barrier, apply this product to soil, ground cover, bark mulch, perimeter vegetation and non-food vegetation adjacent to food plants.

**General use in yards, around gardens -**

Apply Shake-Away® Critter Repellent Granules twice a week for the first two weeks, then twice a month for maintenance. Sprinkle Shake-Away® Critter Repellent Granules A lightly in and around areas where animals are causing damage, or in areas you want to protect.

**In attics, basements, garages and sheds –**

Place two to four ounces of Shake-Away® Critter Repellent Granules on a paper plate or other open container such as a plastic or paper bowl. Place one plate per every 8' X 10' area (80 sq. ft.) where critters are getting in. Replace every four to six weeks, or as needed.

Allow up to two to three weeks for Shake-Away® Critter Repellent Granules to take full effect.

**Coverage –**

Use one ounce of Shake-Away® Critter Repellent Granules for every 30 linear feet. Each bottle of Shake-Away® Critter Repellent Granules will cover up to (600 linear feet – for 20 oz bottle) (5760 linear feet – for 12 lb bottle) when applied as directed.

**STORAGE AND DISPOSAL**

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

**Storage:** Store in a cool, dry place.

**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 or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

*(Warranty Statement)*

