

PM 17 11715-2 MS 1-3

SEP 13 1990

Mr. J.D. Connerford
Spear Products, Inc.
4349 R.F. Goodrich
Memphis, TN 38118

Dear Mr. Connerford:

Subject: Spear Shoe Bug Insect Repellent
EPA Registration No. 11715-2
Your Application Dated June 21, 1990

The proposed amendment to the registration of the product cited above under the Federal Insecticide, Fungicide, and Rodenticide Act removing the active ingredient, NSE R-11, and increasing the percentage of another active ingredient is acceptable subject to the comments listed below. A stamped copy of the label is enclosed for your records.

1. Submit the product-specific product chemistry and the data matrix for this new formulation.
2. Delete the 10 percent (total active) from the ingredients statement.
3. Provide the chemical identity for each of the six perfumes listed in the Confidential Statement of Formula (CSF). Submit the Chemical Abstracts Service (CAS) Numbers and Material Safety Data Sheet for each. All chemical components of each perfume must be identified by CAS Number and percentage in the mixture. The perfumes must be of standard type.

BEST AVAILABLE COPY

4. Submit a 1-year storage stability study. The formulated product must be analyzed for its active ingredients at time zero and during a year of storage. The storage must be under warehouse conditions of temperature and humidity using containers similar to those used in the trade. This data must be submitted within 15 months of the date of this letter.

Sincerely yours,



Phil Button
Product Manager (17)
Insecticide-Rodenticide Branch
Registration Division (N7305C)

Enclosure

BEST AVAILABLE COPY

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS CAUTION

For external use only. May cause eye irritation. Do not get in eyes or on mouth. Harmful if swallowed. Avoid breathing spray mist.

Avoid contact with lips or open cuts. Do not apply to excessively sunburned skin. Do not expose treated skin or clothing to fire, sparks or flame until liquid has evaporated.

STATEMENTS OF PRACTICAL TREATMENT

IF SWALLOWED: Call a physician or Poison Control Center.

IF ON SKIN: May cause skin reactions in rare cases. If so, wash with soap and water. Get medical attention if irritation persists.

IF IN EYES: Flush with plenty of water. Get medical attention if irritation persists.

PHYSICAL AND CHEMICAL HAZARDS

EXTREMELY FLAMMABLE: Contents under pressure. Do not use or store near fire, sparks or heated surfaces. Do not puncture or incinerate container. Exposure to temperatures above 130 F may cause bursting.

Will not damage cotton, denim, wool, nylon or Orlon. Do not use on or near synthetic fabrics such as Rayon, Spandex or Dynel, leather, plastic watch crystals and painted or varnished surfaces. Do not apply on skin under clothing already sprayed. Wash treated skin after returning indoors and double check yourself, other family members and pets for ticks.

SPEER SHOO BUG INSECT

REPELLENT

for
PERSONAL USE

ACTIVE INGREDIENTS:	10.00%
N,N-diethyl-m-toluamide.....	6.65%
Other isomers.....	0.35%
N-Octyl Bicycloheptene Dicarboximide.....	2.00%
Di-n-propyl isocinchomeronate.....	1.00%
INERT INGREDIENTS:	90.00%
TOTAL	100.00%

Repels mosquitoes, gnats, biting flies, chiggers, ticks and other flying insects, including fleas on exposed skin surfaces.

KEEP OUT OF REACH OF CHILDREN

CAUTION

See Back Panel for additional Precautionary Statements

Net WT. _____ oz. (_____ gms.)

EPA REG NO. 11715-2 EPA EST. NO. 11715-TN-1

MANUFACTURED BY
SPEER PRODUCTS, INC.
MEMPHIS, TN 38118

DIRECTION

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

STORAGE AND

STORAGE: Store in a cool, dry place, away from heat or open flame.
DISPOSAL: Wrap in newspaper and place in trash collection. Do not incinerate.

Hold unit 8 - 12 inches from face when spraying, keeping nozzle pointed away from face. Moisten skin or clothing with water before spraying. Frequent reapplication and application to hands and spreading on face of hands of young children.

FOR CLOTHING: For protection against ticks, chiggers and fleas, use on all parts of clothing, such as neck, cuffs, sleeve cuffs, sock tops, and waistband. Insects may crawl under clothing. Wear shoes or boots. Wear long sleeved shirt tucked into pants for ticks.

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