

PM17
11715-85
P
APR 11 1990

Spear Products, Inc.
c/o Pazianos Associates
1338 G Street, SE.
Washington, DC 20003

Dear George Pazianos

Subject: Spear Double Strength Insect Repellent
EPA Reg. No. 11715-85
Application dated March 16, 1990

The proposed amendment to the registration of the product cited above under the Federal Insecticide Fungicide and Rodenticide Act removing the active ingredient, MGK R-11, and increasing the amount 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 chemistry data for this new formulation including a 1 year storage stability study.
- 2) Provide the chemical identity and percentages of all components of:
 - a) ~~XXXXXXXXXXXXXXXXXXXX~~
 - b) ~~XXXXXXXXXXXX~~

The information should include Chemical Abstract Numbers and Manufacturing Safety Data Sheets.

Sincerely yours,

Phil Hutton

Phil Hutton
Product Manager (17)
Insecticide-Rodenticide Branch
Registration Division (H7505C)

55891:Tavano:CBI-11:KENCO:4/4/90:5/4/90:dg:sw:vo:dd:ka

CONCURRENCES

SYMBOL	H7505C						
SURNAME	Tavano						
DATE	4/9/90						

**Double Strength Protection against
Ticks and Other Listed Insects**

**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 Lynel, 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
DOUBLE STRENGTH
INSECT
REPELLENT**

for
Fishermen, Hunters, and Campers

ACTIVE INGREDIENTS:	38.35%
N,N-diethyl-m-toluamide	27.32%
Other isomers	1.44%
N-Octyl Bicycloheptene Dicarboximide	7.67%
Di-n-propyl isocinchomeronate	1.92%
INERT INGREDIENTS:	61.65%
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. 11715-85 EPA EST. NO. 11715-TN-1

**MANUFACTURED BY
SPEER PRODUCTS, INC.
'MEMPHIS, TN 38118**

ACCEPTED
with COMMENTS
in EPA Letter Dated

DIRECTIONS FOR USE

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

STORAGE AND DISPOSAL

STORAGE: Store in a cool, dry place away from heat or open flame.
DISPOSAL: Do not reuse or refill this container. Wrap container for disposal. Do not puncture.

Hold unit 8 - 12 inches from skin or clothing, spraying, keeping nozzle pointed away from face. Slightly moisten skin or clothing before spraying. Frequent reapplication is unnecessary. Apply on face, neck, and arms in small amounts in palm of hand. Do not apply to face or neck. Do not apply to children.

FOR CLOTHING: For external use only. For crawling ticks, chiggers and fleas, spray along all openings of clothing, including waist band, pant and sleeve cuffs, and other areas where these insects may hide. For added protection, spray shoes or boots, tuck pants into shoes, and sleeve shirt tucked into pants.

BEST AVAILABLE COPY

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

11715-85