

DEC 11 1991

T. David Williams, J.D.  
Speer Products Incorporated  
P.O. Box 18933  
Memphis, Tennessee 38118

Dear Mr. Williams:

Subject: Revised labeling in response to DEET LIP  
Speer Double Strength Insect Repellent  
EPA Registration Number 11715-85  
Submission dated November 27, 1991

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 comments listed below. Five copies of the final printed labeling must be submitted prior to releasing the product for shipment.

1. Correct the ingredient statement appearing on the product label to delete the figure "38.35%" for total active ingredients. The total for the inert ingredients should read "61.65%", and not "61.95%".
2. Delete the reference to "extra" spray which appears on the product label in the section titled "FOR CLOTHING". This label language is inconsistent with the DEET LIP.

Sincerely,

*RFM*

Richard F. Mountfort  
Product Manager (10)  
Insecticide-Rodenticide Branch  
Registration Division

**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 or 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.

**STORAGE AND DISPOSAL**

**STORAGE:** Store in a cool area away from heat or open flame.

**DISPOSAL:** Do not reuse empty container. Wrap container and put in trash collection. Do not puncture or incinerate.

**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: .....	61.95%
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**

**DIRECT**

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

Read all directions before use. Do not spray in enclosed areas, or on wounds, or irritated skin.

Hold unit 8-12 inches from skin when spraying, keeping nozzle moving in motion. Apply only small amounts in palm of hand. Do not apply to the face or neck. Do not apply to the hands. Apply enough repellent to cover skin. Do not use under clothing. Frequent reapplication is necessary for effectiveness. Do not treat skin with soap or water. Wash yourself, other family members, and pets.

**FOR CLOTHING:** For protection against ticks, chiggers, and other insects, spray openings of clothing, including pant and sleeve cuffs, and areas where these insects may hide. Add protection from ticks by tucking pants into socks and shoes. Wash treated clothing before use.

Use of this product may cause drowsiness. If you suspect overdose, call your doctor. Do not use if you are pregnant or nursing. Do not use if you are taking any medicine. Do not use if you are drinking alcohol. Do not use if you are operating machinery. Do not use if you are driving a vehicle. Do not use if you are pregnant or nursing. Do not use if you are taking any medicine. Do not use if you are drinking alcohol. Do not use if you are operating machinery. Do not use if you are driving a vehicle.

In  
D  
Unde  
Fung  
as an  
regist