

DEC 16 2002

Jean Butler  
Speer Products Inc.  
4242 B. F. Goodrich Blvd.  
P.O. Box 18993  
Memphis, TN 38181-0993

Subject: Amended Label For:  
Speer Double Strength Insect Repellent  
EPA Registration No. 11715-85  
Application dated September 4, 2002

Dear Ms. Butler:

The proposed amendment to the registration of the product cited above under the Federal Insecticide, Fungicide, And Rodenticide Act, as amended revising the label in accordance with PR Notices 2001-1 and 2001-6 is acceptable subject to the comments listed below:

- 1) In the Ingredients Statement change the declaration of the active ingredient, deet, to read:

Deet.....28.76%

The amount of active Deet in the various Technical Deet formulations has changed. This may effect the amount of the Technical you use to make up your product. Check with your supplier.

- 2) Add the following statements to the directs for use:

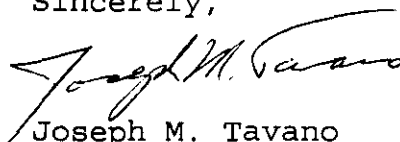
Apply sparingly around ears.  
Do not allow children to handle this product.  
When using on children, apply to your own hands and then put it on the child.

- 3) Change the statement, ~~Read~~ all directions before using this product.~~Read~~, to read ~~Read~~ and follow all directions and precautions on this product label.~~Read~~.
- 4) As part of the reregistration for DEET, efficacy data for end-use products will be required. The exact data requirements will not be determined until the efficacy data guidelines have been published. When these guidelines are published you will be informed of the requirements.

A stamped copy of the revised label is enclosed for your records. Submit two copies of the final label before this product is released for shipment under this amended labeling.

If you have any questions or comments please contact me at (703) 305-6411.

Sincerely,

A handwritten signature in dark ink, appearing to read "Joseph M. Tavano". The signature is fluid and cursive, with a large initial "J" and a stylized "T".

Joseph M. Tavano  
Acting Product Manager 10  
Insecticide Branch  
Registration Division (7505C)

**SPEER DOUBLE STRENGTH  
INSECT REPELLENT**  
For Fishermen, Hunters, and Campers

**DOUBLE STRENGTH PROTECTION  
AGAINST TICKS AND OTHER LISTED  
INSECTS**

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

**ACTIVE INGREDIENTS:**

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%

**KEEP OUT OF REACH OF CHILDREN  
CAUTION**

See Back Panel for additional  
Precautionary Statements

Net Wt. \_\_\_\_ oz ( \_\_\_\_ gms.)

**EPA REG. NO. 1-715-85**  
**EPA EST. NO. 1-715 TN-1**

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

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**DIRECTIONS FOR USE**

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

Read all directions before using this  
product. Do not spray in enclosed areas.  
Do not apply over cuts, wounds, or irritated  
skin.

Hold unit 8-12 inches from skin or clothing  
while spraying, keeping nozzle pointed  
away from face. Slightly moisten skin or  
clothing with a slow sweeping motion.  
Apply on face by first spraying small  
amounts in palm of hand and spreading on  
face or neck. Do not apply to eyes or  
mouth and do not apply to the hands of  
young children. Use just enough repellent  
to cover exposed skin and clothing. Do not  
use under clothing. Avoid overexposure.  
Frequent reapplication and saturation is  
unnecessary for effectiveness. After  
returning indoors, wash treated skin with  
soap and water and double check yourself,  
other family members, and pets for ticks.

**FOR CLOTHING:** For protection from  
crawling ticks, chiggers, and fleas, use  
spray along all openings of clothing such  
as neck band, waist band, pant and sleeve  
cuffs, sock tops, and other areas where  
these insects may crawl under clothing.  
For added protection from ticks, wear  
shoes or boots, tuck pants into socks.  
Wear long sleeved shirt tucked into pants.  
Inspect often for ticks. After using, wash  
treated clothing.

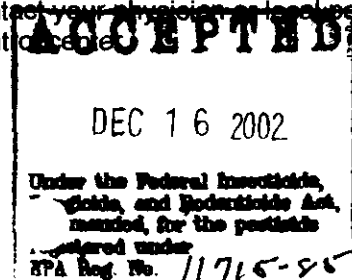
Use of this product may cause skin  
reactions in rare cases. If you suspect that  
you or your child is reacting to this product,  
wash treated skin with soap and water and  
contact your physician or local poison  
control center.

**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.

FIRST AID	
IF SWALLOWED	<ul style="list-style-type: none"> <li>• Call a 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>
IF ON SKIN OR CLOTHING	<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</li> </ul>



	doctor for treatment advice.
<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>
<b>IF INHALED</b>	<ul style="list-style-type: none"> <li>• Move person to fresh air.</li> <li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.</li> <li>• Call a poison control center or doctor for further treatment advice.</li> </ul>
<b>HOT LINE NUMBER</b> Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-877-757-4943 for emergency medical treatment information.	

**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 puncture or incinerate! **If empty:** Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency or 1-800-CLEANUP for disposal, instructions.