

MAY 10 1990

Speer Products Incorporated  
4242 B.F. Goodrich Boulevard  
Memphis, TN 38118

Dear E. George Pasianco

Subject: Speer Insect Repellent for Fishermen, Hunters & Campers  
EPA Reg. No. 11715-86  
Application dated February 22, 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 chemistry data for the new formulation.
- 2) Submit a 1 year storage stability study. The formulated product must be analyzed for its active ingredients at time zero and for one year of storage. The storage must be under warehouse conditions of temperature and humidity using containers similar to those which will be used in the trade. This study must be submitted within 15 months of the date of this letter.
- 3) Add the statement "Do not puncture or incinerate" to the Storage and Disposal statement.

55898:I:Tavano:CBI-01:KENCO:05/03/90:08/03/90:ka:SW:O:DD:CT

CONCURRENCES

| SYMBOL | SURNAME | DATE   |  |  |  |  |  |  |
|--------|---------|--------|--|--|--|--|--|--|
| H7505C | Tavano  | 5/4/90 |  |  |  |  |  |  |

- 4) Provide the chemical identity and percentage in the mixture of all components of the ingredients listed below. Include Chemical Abstract Numbers for each component and a Material Safety Data Sheet for each ingredient.

a) [REDACTED]

b) [REDACTED]

Sincerely yours,



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

**Precautionary Statements  
Hazards to Humans**

**CAUTION**

For external use only. Harmful if swallowed. Avoid breathing spray mist. May cause eye irritation. Avoid contact with eyes, lips or open cuts. Do not expose treated skin or clothing to fire, sparks or flame until liquid has evaporated. Do not allow children to rub eyes if hands have been treated.

**Physical Hazards**

Extremely Flammable. Contents under pressure. Do not use near fire, heated surfaces, sparks or flame. Do not puncture or incinerate container. Exposure to temperatures above 130 degrees F may cause bursting. Contains alcohol. Do not light matches or expose skin or clothing to fire until alcohol has evaporated (approximately 10 minutes). May damage some plastics, varnished or painted surfaces. Do not use on Rayon, Spandex or Dynel. May be used on Nylon, Orlon, wool or cotton.

**STATEMENT OF PRACTICAL  
TREATMENT**

If swallowed - Do not induce vomiting. Consult a physician.  
If on skin - May cause skin reactions in rare cases. If so, wash thoroughly with plenty of soap and water. Get medical attention if irritation persists.  
If in eyes - Wash with plenty of water. Get medical attention if irritation persists.

**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.

**SPEER  
INSECT REPELLENT**  
for Fishermen, Hunters, and Campers

**ACTIVE INGREDIENTS:**

|   |                |
|---|----------------|
| N,N-diethyl-m-toluamide.....              | 13.66%         |
| Other isomers.....                        | 0.72%          |
| N-Octyl Bicycloheptene Dicarboximide..... | 3.84%          |
| Di-n-propyl isocinchomeronate.....        | 0.96%          |
| <b>INERT INGREDIENTS:</b> .....           | <b>80.82%</b>  |
| <b>TOTAL</b> .....                        | <b>100.00%</b> |

Repels mosquitoes, 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. 11715-86      EPA EST. NO. 11715-TN-1

Manufactured by

**SPEER PRODUCTS, INC.**  
Memphis, TN 38118

**DIRECTIONS FOR USE**

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

Remove protective cap, and spray a distance of 8 - 12 inches from the body to be protected. Slightly moisten skin - saturation is not necessary. Use with sweeping motion.

**FOR EXPOSED SKIN AREAS:** Repel flies, gnats and mosquitoes as directed above. **AVOID CONTACT WITH EYES OR MOUTH.** Rub on face, spray in palm of hands, rub palms together and rub on face.

**FOR CLOTHING, to repel ticks and chiggers:** (See CAUTION) liberal application along all open areas of the clothing, such as the neck, cuffs of fly and cuffs of trousers, tops of shoes, eyelets of shoes and areas of clothing which may contact the ground, and other growth.

ACCEPTED  
with COMMENTS  
in EPA Letter Dated:

JUL 10 1990

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

11715-86