

300 / 267,312
18

JUL 26 1988

655 / 261,74
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Mr. David Williams
Regulatory Affairs Specialist
Spear Products, Inc.
P.O. Box 18993
Memphis, TN 38118

Dear Mr. Williams:

Subject: Formulation and Labeling Amendment Requests
EPA Registration No. 11715-92
Your Confidential Statement of Formula Dated September 27, 1988

The amendments referred to above, submitted in connection with registration under section 3(c)(7)(A) of the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, are acceptable subject to the following comments.

1. The formulation described in your September 27, 1988 Confidential Statement of Formula (CSF) is the basic and only formulation for this product. Submit a revised CSF reflecting that this is the basic formulation.
2. Due to the hydrocarbon propellents in your product, add the phrase "Extremely Flammable" to the beginning of the Physical or Chemical Hazards section.

Sincerely yours,



Phil Button
Product Manager (17)
Insecticide-Rodenticide Branch
Registration Division (E7505C)

51221:I:WP5.0;Mendelsohn;C.Disk;KENCO;07/03/90;DD:vc;jh:de

CONCURRENCES

SYMBOL							
SURNAME							
DATE							

ACCEPTED
with COMMENTS
in EPA Letter Dated:

JUL-26 1990

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

PET GUARD
FLEA & TICK SPRAY
FOR DOGS & CATS
(WITH REPELLENT)

Kills Fleas, Ticks and Lice
Stops Scratching

Repellent to Gnats, Mosquitoes and Flies

Contains deodorant that controls bacterial odors

ACTIVE INGREDIENTS:

d/l-allethrin 4-trans chrysanthemate 0.1002
Piperonyl Butoxide, Technical 0.6002
Butanediol 3.0002

INERT INGREDIENTS: 94.3002

*Equivalent to 0.4% (d,l-allethrin) (4-trans-chrysanthemate) and 0.12% related compounds.

KEEP OUT OF REACH OF CHILDREN
CAUTION

Harmful if swallowed or inhaled. Avoid contact with skin.
See rear panel for additional precautions.

EPA Reg. No. 11715-02

EPA Est. No. 11715-TN-1

Manufactured By

SPEER PRODUCTS, INC.

MEMPHIS, TN 38118

Net Wt. _____

BEST AVAILABLE COPY

STATEMENT OF PRACTICAL TREATMENT

If swallowed- Call physician or Poison Control Center immediately.

If inhaled - Remove victim to fresh air. Apply artificial respiration if indicated.

If on skin - Remove contaminated clothing and wash area with soap and water.

If in eyes - Flush eyes with plenty of water. Obtain medical attention if irritation persists.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Harmful if swallowed or inhaled. Avoid breathing of mist. Avoid contact with skin; wash thoroughly after use. Avoid contamination of feed and foodstuffs. Do not cause exposure of kittens or puppies less than four weeks of age.

PHYSICAL OR CHEMICAL HAZARDS

Contents under pressure. Do not use or store near heat or open flame. Do not puncture or incinerate container. Exposure to temperatures above 130° F may cause bursting.

DIRECTIONS FOR USE

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

STORAGE AND DISPOSAL

Storage: Store in a cool, dry area away from heat or flame.

Disposal: Replace cap and discard containers in trash. Do not incinerate or puncture.

Remove protective cap, hold container upright, nozzle from you. With nozzle 10 to 12 inches away, direct spray at the animal, beginning at the tail, spray over the entire coat is damp to the back of the neck. On dogs and cats, ruff, the coat and spray against the spraying directly behind hand so that spray reaches best results in controlling tick infestations, locate and spray directly on them. Avoid spraying face and genital area. Duration of 10 to 45 seconds is usually sufficient for dog, for cats about 10 seconds is adequate. Repeat weekly if necessary.

NOTE: Do not use or cause exposure of kittens or puppies less than four weeks of age.

In kennels or other sleeping quarters to control ticks, to deodorize the quarters spray the animal regularly. Spray bedding, walls, cracks, crevices and flooring as