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Mr. T. David Williams  
 Speer Products, Inc.  
 4242 B.F. Goodrich Blvd.  
 Memphis, TN 38118

Dear Mr. Williams:

**Subject: Amendment - Revised Confidential Statement of Formula (Deletion of Methylene Chloride from the Formulation) and Labeling - Removal of Xylene from Active to Inert Ingredients**  
 Speer Screwworms & Ear Tick Killer  
 EPA Registration No. 11715-94  
 Your Letters Dated January 23, 1986, August 17, 1988 and December 4, 1991

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable provided that you make the labeling changes indicated below prior to release for shipment of product bearing the amended labeling.

- Under **Storage and Disposal**, add the following statement:

**Pesticide Disposal:** Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

- Change the statement "**Contains aromatic petroleum distillates**" to "**Contains xylene range aromatic solvents**".

- Under the **Directions for Use**, add the statements:

Do not spray within 30 days of slaughter. Do not treat overheated or sick animals. Do not use on poultry.

	4. The label must <sup>CONCURRENCES</sup> clearly state the sites of application/treatment. We assume this is cattle, sheep,						
SYMBOL							
SURNAME							
DATE							

goats and horses. Thus, on the front panel add:

A Screwworm and Ear Tick Killer for Use on Beef Cattle,  
Sheep, Goats and Horses.

Submit five copies of your final printed labeling before you release the product for shipment. A stamped copy of the labeling is enclosed for your records.

We acknowledge and accept the removal of methylene chloride from the formulation, however in accordance with 40 CFR 180.1001(e), 1,1,1,-Trichloroethane must not be present in more than 25% of the pesticide formulation, therefore the formulation is not acceptable. Note that the Confidential Statement of Formula (CSF) dated August 18, 1988, (alternate formulation) and the CSF dated November 1, 1985 (basic formulation) are same formulation. Please clarify.

Sincerely yours,

George T. LaRocca  
Product Manager 13  
Insecticide-Rodenticide Branch  
Registration Division (H7505C)

**A LIVESTOCK REMEDY  
NOT FOR HUMAN USE.  
FOR EXTERNAL USE ONLY.**

**(Violet Color Added for Marking Treated Areas)  
DIRECTIONS FOR USE**

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

**For Control of Screwworm Larvae:** On cattle, sheep, goats and horses. Release spray by pushing nozzle forward or to either side. Hold nozzle 4 inches away from wound during application, and continue to spray until it is completely covered and wet. Work thoroughly into wounds and open holes. Spray a light application on drainage area below wounds. Color has been added to this product to enable easy identification of treated wounds. Repeat application twice weekly until wound is healed.

Some strains of screwworms may develop resistance to lindane. This will be observed by lack of response to treatment. **Protect Uninfested Wounds:** Spray all wounds on cattle, sheep, goats and horses, such as wire cuts, shear cuts, docking and dehorning, as soon as possible to avoid infestation. Repeat at 7 days intervals until healed. **Young Calves:** Young calves over 3 months old spray sparingly. Never use more than necessary for adequate coverage of affected area.

**To Kill Fleece Worm:** Spray directly on infested area and drainage area below. Repeat as necessary.

**To Kill Spinose Ear Tick:** In cattle, horses, goats and sheep. Grasp animal's ear firmly and direct spray downward into the ear. Release spray for three seconds per ear in treating cattle and two seconds per ear in treating smaller animals. Do not use on calves under the age of 3 months.

# **SPEER SCREWWORM & EAR TICK KILLER**

**Pressurized  
Violet Color Added**

**ACTIVE INGREDIENTS:**

Lindane (Gamma Isomer of Benzene Hexachloride) ..... 3.0%

**INERT INGREDIENTS:** ..... 97.0%

**TOTAL** ..... 100.00%

Contains aromatic petroleum distillates.

**KEEP OUT OF REACH OF CHILDREN  
CAUTION**

**See Back Panel for Additional  
Precautionary Statements**

**Net Wt. \_\_\_\_\_ Oz.**

EPA Reg. No. 11715-94 EPA Est. No. 17715-TN-1

**Manufactured by:  
SPEER PRODUCTS, INC.  
Memphis, TN 38118**

**Precautionary Statements  
HAZARDS TO HUMANS AND DOMESTIC ANIMALS  
CAUTION**

Harmful if swallowed. May be absorbed through skin. Avoid inhalation of spray mist and contamination with hands as much as possible. If sprayed on skin or in eyes, wash thoroughly. Do not use on dogs, cats or other household pets or humans. Applicators must wear the following protective clothing during the treatment process: Elbow-length, waterproof gloves; a waterproof apron; and unlined, waterproof boots. **DO NOT ALLOW CHILDREN TO HANDLE OR APPLY THIS PESTICIDE.**

For external use only. If necessary, especially for young animals, do not use this product in dairy barns, processing rooms, or other areas where (very young) animals are kept. Area treated with extra care. Do not contaminate feed product only as specified.

**CHEMICAL OR EXTREMELY FLAMMABLE.** Do not use under pressure. Keep away from heated surfaces. Do not incinerate container. Temperature above 130°F may cause explosion.

**STATEMENT OF TREATMENT**

**If swallowed--Call a physician.** Gastric lavage is indicated if taken internally. DO NOT induce vomiting unless other treatment is indicated. Inducing vomiting may cause aspiration pneumonia. If necessary to induce vomiting, give one or two glasses of water or milk. Do not give anything by mouth to an unconscious person. **If inhaled--Remove to fresh air.** If necessary, respiration if indicated. **If on skin--Wash clothing and water.** **If in eyes--Flush eyes with water at least 15 minutes.** Seek medical attention immediately.

**STORAGE:** Store in a cool, dry place. Do not store near heat or open flame. **DISPOSAL:** Replace container in trash. Do not reuse.

See Back for Stamp

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