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JUN 13 1996

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Speer Products Inc.
P.O. Box 18993
Memphis, TN 38181

Attention: Mr. Bill Washburn

Subject: Magic Guard with Rotenone/Pyrethrins
EPA Registration No. 11715-158
Your amended application of October 18, 1995

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable provided that you make the following changes and submit one (1) copy to us before your ship product:

1. Revise your ingredient statement as follows:

Active Ingredients	
Rotenone	1.1
Other Associated Resins	2.2
Pyrethrins	0.8
Inert Ingredients*	<u>95.9</u>
Total	100.0

*Contains Aromatic Petroleum Distillates

2. Change the ENVIRONMENTAL HAZARDS section to read:

This product is extremely toxic to fish. Do not apply directly to water. Runoff and drift from treated areas may be hazardous to aquatic organisms in adjacent sites. Do not contaminate water when disposing of equipment washwaters.

3. Revise the "Storage and Disposal" statement as follows:

STORAGE AND DISPOSAL

Storage: Store only in original container, in a dry place inaccessible to children and pets.

Disposal: Do not reuse empty container. Wrap securely in newspaper and discard in trash.

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- 4. Delete all references to cats and ornamentals on the label since your source product specifies that:

This product may be used for repackaging as an end-use product identical to ... EPA Reg. No. 432-684.

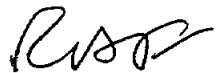
The only site on that end-use product are "dogs".

- 5. Revise your dog directions according to the enclosed label, including the prohibition against using the product on animals four (4) weeks or younger.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

A stamped copy of the labeling is enclosed for your records.

Sincerely yours,



Robert A. Forrest
Product Manager (14)
Insecticide-Rodenticide Branch
Registration Division (H7504C)

- Enclosures: 1. Stamped Label
2. A-79 Enclosure

Peacock:A:9:A:\Rotenone\11715.158

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ACCEPTED
with COMMENTS
in EPA Letter Dated

JUN 13 1996

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
11715-158

MAGIC GUARD
with ROTENONE/PYRETHRINS
EMULSIFIABLE CONCENTRATE 1.1% + 0.8%

**EMULSIFIABLE PYRETHRUM-ROTENONE
PLANT & ANIMAL INSECTICIDE**
Contains 0.08 lb/gal (9.9 g/L) of Rotenone &
0.06 lb/gal (7.2 g/L) of Pyrethrins

ACTIVE INGREDIENTS:

Rotenone.....	1.1%
Other Cube Extractives.....	2.2%
Pyrethrins.....	0.8%
Petroleum Distillate.....	3.2%
Aromatic Petroleum Solvent.....	84.7%
INERT INGREDIENTS:	<u>8.0%</u>
	100.00%

PRECAUCION AL CONSUMIDOR: Si usted no lee Ingles, no use este
producto hasta que la etiqueta le haya sido explicada ampliamente.
TRANSLATION: (To the user: If you cannot read English, do not use this
product until the label has been fully explained to you.)

**KEEP OUT OF REACH OF CHILDREN
WARNING**
SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY
STATEMENTS AND STATEMENT OF PRACTICAL
TREATMENT

EPA REG. NO. 11715-158

EPA EST. 11715-TN-1

NET CONTENTS _____

Manufactured By:
SPEER PRODUCTS, INC.
P. O. Box 18993
Memphis, TN 38118

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
WARNING**

May be fatal if swallowed. Harmful if absorbed through skin. Causes skin
irritation. May cause substantial but temporary eye injury. ~~Wear safety~~
glasses. Do not get in eyes, on skin, or on clothing. Avoid breathing spray
mist. Wash thoroughly with soap and water after handling. Remove
contaminated clothing and wash before reuse.

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Call a physician or Poison Control Center. Drink
promptly a large quantity of milk, egg whites, gelatin solution, or, if these are
not available, drink large quantities of water. Avoid alcohol. Do not induce
vomiting: This product contains aromatic petroleum solvent. Aspiration may
be a hazard.
IF IN EYES OR ON SKIN: Flush with plenty of water. Get medical
attention if irritation persists.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not apply directly to water. Do not
contaminate water by cleaning of equipment or disposal of wastes.

PHYSICAL AND CHEMICAL HAZARDS

DO NOT USE OR STORE NEAR HEAT OR OPEN FLAME. Flash Point
minimum 120°F (48.9°C).

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

STORAGE: Store in a cool, dry area away from heat and open flame and
inaccessible to children.

DISPOSAL: Do not reuse empty container. Wrap container and place in
trash collection.

DIRECTIONS FOR USE

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

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For use on ornamental and flowering plants such as poplar, linden, dogwood, willow, birch, boxelder, maple, oak, elm, pine, spruce, cedar, yew, spirea, rose, lilac, zinnia, aster, petunia, geranium, dahlia, gladiolus, phlox, sweet pea, marigold, carnation, chrysanthemum, and rose. Mix this product with water as described in the following chart. Use hand or automatic sprayer as a coarse spray. Use sufficient spray mix to give complete coverage of the plant. Do not apply this product within one day of collection. Repeat every 5-10 days or as needed. Keep diluted spray away from light.

PESTS

**VOLUME OF PRODUCT/
GALLON OF WATER (3.79L)**

Aphids, Leafhoppers, Exposed Thrips	1 teaspoon (5ml)
Oblique-banded Leaf Rollers, Sawfly larvae, Boxelder Bugs, Japanese Beetles, Elm Leaf Beetle Larvae, Mites, Lygus Bugs, Lace Bugs, Greenhouse Whiteflies, Stink Bugs, Garden Fleahoppers, Greenhouse Leaf-tiers	2 teaspoons (10ml)
Cucumber Beetles, Rose Chafers, Ants, Aster Beetles, Flea Beetles	4 teaspoons (20 ml)

TO KILL FLEAS, TICKS, AND LICE ON DOGS, CATS, AND PREMISES: (Keep diluted spray away from light).

ON DOGS: DO NOT USE MORE THAN 1 FLUID OUNCE (2 Tbsp.) (30 ml) PER GALLON (3.79 L) ON PUPPIES.

For fleas and lice, dilute **MAGIC GUARD** insecticide at the rate of 1 fluid ounce (2 Tbsp.) (30 ml) per gallon (3.79 L) of water. [For young animals, use 1/2 fluid ounce (1 Tbsp.) (15 ml) per 1 gallon (3.79 L) of water] Apply directly to animal as a spray, sponge-on or a wash. Treat until animal's skin is wet. Do not rinse.

For ticks, dilute **MAGIC GUARD** insecticide at the rate of 2 fluid ounces (4 Tbsp.) (60 ml) per 1 gallon (3.79 L) of water. [For young animals, use 1 fluid ounce (2 Tbsp.) (30 ml) per 1 gallon (3.79 L) of water]. Apply directly to animal as a spray,

Avoid contact with eyes, nose or mouth of animal. To prevent reinfestation, thoroughly spray the animal's living quarters with **MAGIC GUARD** insecticide.

ON CATS: DO NOT USE ON YOUNG KITTENS. ON ADULT ANIMALS DO NOT USE MORE THAN 1 FLUID OUNCE (2 Tbsp.) (30 ml) PER GALLON (3.79 L).

For fleas, ticks and lice, dilute **MAGIC GUARD** insecticide at the rate of 1 fluid ounce (2 Tbsp.) (30 ml) per gallon (3.79 L) of water. Apply directly to animal as a spray, sponge-on or a wash. Treat until animal's skin is wet. Do not rinse.

Avoid contact with eyes, nose or mouth of animal. To prevent reinfestation, thoroughly spray the animal's living quarters with **MAGIC GUARD** insecticide.

WARRANTY STATEMENT

Our recommendations for the use of this product are based upon tests believed to be reliable. The use of this product being beyond the control of the manufacturer, no guarantee, expressed or implied, is made as to the effects of such or the results to be obtained if not used in accordance with directions or established safe practice. The buyer must assume all responsibility, including injury or damage, resulting from its misuse as such, or in combination with other materials.

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