JUN 2 1 1998

BEST AVAILABLE COPY

Spear Products, Inc. c/o Pazianos Associates 1338 G Street W.E. Washington, D.C. 20003

Dear George Pasianos

Subject: Speer Liquid Flee & Tick Killer With Repellent & Decdorent EPA Reg. No. 11715-160 Application dated March 30, 1990

The proposed amendment to the registration of the product cited above under the Pederal Insecticide Fungicide and Rodenticide Act resoving the active ingredient, NGK R-11, is acceptable subject to the comments listed below. A stamped copy of the label is enclosed for your records.

1) Submit the following chemistry data on the new formulation:

Color - in common terms. Physical State - e.g. solid, liquid, pressurized liquid, etc. Odor - in common terms. Density - e.g. lbs/gallon for liquids or lbs/cu. ft. for solids. pm - provide pM of product or pH of a specifie water dilution. Oxidizing or Reducing - note these characteristics if any. Plansability - flash point/flase extension. Explodability - note these characteristics if any. Storage Stability - the formulated product must be analyzed for its active ingredient at time zero and during a year of storage. The storage should be in warehouse conditions of temperature and humidity and stored in similar containers you will be using in the trade. Note: For the Storage Stability study you cannot reference the concentrate you are using to formulate your product. Viscosity - can be expressed in centipoise or centiatokes. Miscibility - note these characteristics if product is an emulsifiable liquid and mixed with oil.

58814:I:Tavano:CBI-02:KENCO:06/15/90:07/14/90:ka:sw:vo:dd:ka

CONCURRENCES								
SYMBOL	H7505C				•••••			
SURHAME	Tarons				·			\$
DATE	6/18/90							
PPA Face 1	120-1 /12-701				·		OFFICE	AL EN E CORY

Corrosion Characteristics - this information can be noted during the storage stability study. Dielectric Breakdown Voltage - for products used near electrical equipment.

- 2.) Provide the chemical identity, Material Safety Data Sheet, and Chemical Abstracts Number for the followirs:
  - a) Crovol A-70
  - b) Perfume B-7863

All chemical components of the perfume must be identified by Chemical Abstracts Number and percent in the mixture. Indicate the Durpose for Crowol A-70 in the formulation.

3.) Add the statement "Do not use this product in or on electrical equipment due to the possibility of shock hazard" to the use directions.

The eye irritation data is under review. You will be informed of the results once the review has been completed. Further labeling revisions way be necessary depending on the results of this data.

Sincerely yours,

Phil Button

Product Manager (17)

Insecticide-Rodenticide Branch Registration Division (H7505C)

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KILLS & REPELS - Fleas, Ticks, Lice, Stable Flies, Horn Flies, Houseflies, Face Flies, Horse Flies, Deer Flies, Bat Flies, Mosquitoes and Gnats.

#### **PRECAUTIONARY STATEMENTS**

### HAZARDS TO HUMANS AND DOMES-TIC ANIMALS

#### CAUTION

Harmful if swallowed. Avoid inhalation of vapors. Avoid contact with skin, eyes or clothing. If in eyes, flush with plenty of water. Call a physician if irritation persists, Wash skin with warm water and soap. Do not contaminate food or foodstuffs.

Avoid treatment of nursing puppies or kittens. If treatment is necessary, spray fingertips and rub into animal's cost. Do not spray into eyes, face, or genitals. If reaction should occur, contact your veterinarian immediately.

This product is toxic to fish. Keep out of lakes, ponds, streams, tidal marshes and estuaries.

#### PHYSICAL HAZARDS

Flammable. Keep away from heat and open flame. Do not smoke while spraying.

# STORAGE AND DISPOSAL

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

Storage: Do not use or store near heat or open flame. Store in a dry area inaccessible to children.

**Disposal:** Do not reuse empty bottle. Rinse thoroughly before discarding in trash.

**AVAILABLE THROUGH LICENSED VETERINARIANS** 

#### STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Call a physician or poison control center. IF ON SKIN: Wash off with soap and water. Get medical attention if iiritation persists. IF IN EYES: Flush with pienty of water. Get medical attention if iiritation persists.

# **SPEER**

(Liquid)

#### **FLEA & TICK KILLER**

With Deodorant

KILLS FLEAS, TICKS and LICE

REPELS Gnats, Housefiles, Stable Files and Mosquitoes

**DEODORIZES & CONDITIONS** 

#### **ACTIVE INGREDIENTS:**

Pyrethrins	0.150%
*Piperonyl Butoxide, technical	1.500%
N-Octyl bicycloheptene dicarboximide	0.500%
INERT INGREDIENTS:	97.850%
*Equivalent to 1.20% (butylcarbityl)(6-proj	oyl piperonyi)

ether and 0 30% other related compounds.

FOR USE ON DOGS, CATS, PUPPIES, KITTENS, HORSES, AND PONIES.

# KEEP OUT OF REACH OF CHILDREN CAUTION

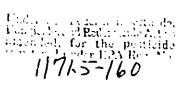
See Side Panel for additional , ecautions.

Net Contents \_\_\_\_\_

ACCEPTED with COMMENTS
EPA Reg. No. 11715-1160 Lettralesu.no. 11715-11.1

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# DIRECTIONS FO

It is a violation of Federal law to use inconsistent with its labeling.

# USE ONLY IN A WELL VE

CAUTION: The product may squirt of protective nozzle cap is removed if than room temperature. Remove presprayer by rotating tab to up position nozzle. Retain protective cap and Spray at a distance of 6 - 12 inches repeatedly and rapidly.

## DOGS AND C

Cover animals eyes with hand and with head, ears and chest until damp. Wit and around mouth, nose and eyes, and hind quarters, finish to gusters.

For best results, direct spray against On long-haired dogs, rub your hand; spraying the ruffled hair directly bet spray thoroughly wets ticks. Repeat

# **PUPPIES AND K**

Spray back of pet only, then spray of into animal's coat and around mout!

#### **KENNELS OR PET SLEEF**

Apply thoroughly to infested areas resting quarters, nearby cracks and hind baseboards, window and door of floor and floor covering where flex present. Old pet bedding should be with fresh bedding after treatment of product before allowing them to er spray surfaces where spotting, staining be objectionable.

#### HORSES AND F

To control stable flies, horse flies, remove excess dirt from legs, flanks areas commonly ettacked by these flies cloth with spray and rub on face a avoid eyes. Repeat treatment as nec

**MANUFACTUR** 

SPEER PROD MEMPHIS, TN

