

JUN 21 1990

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

Dear George Pazianos

Subject: Spear Liquid Flea & Tick Killer With Repellent & Deodorant
EPA Reg. No. 11715-160
Application dated March 30, 1990

The proposed amendment to the registration of the product cited above under the Federal Insecticide Fungicide and Rodenticide Act removing the active ingredient, NOK 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.

pH - provide pH of product or pH of a specific water dilution.

Oxidizing or Reducing - note these characteristics if any.

Flammability - flash point/flame extension.

Explosibility - 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 centistokes.

Miscibility - note these characteristics if product is an emulsifiable liquid and mixed with oil.

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

CONCURRENCES							
SYMBOL	M7505C						
SURNAME	Tavano						
DATE	6/18/90						

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 following:

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 purpose for Crovol 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 may be necessary depending on the results of this data.

Sincerely yours,



Phil Hutton
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 DOMESTIC 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 coat. 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 irritation persists. IF IN EYES: Flush with plenty of water. Get medical attention if irritation persists.

SPEER

(Liquid)

FLEA & TICK KILLER

With Deodorant

KILLS FLEAS, TICKS and LICE

REPELS Gnats, Houseflies, Stable Flies 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% (butylcarbitol)(6-propyl piperonyl) 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 precautions.

Net Contents _____

ACCEPTED

with COMMENTS

EPA Reg. No. 11715-TN-1

2 1990

11715-160

DIRECTIONS FOR USE

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

USE ONLY IN A WELL VENTILATED AREA

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

DOGS AND CATS

Cover animals eyes with hand and wipe head, ears and chest until damp. Wipe and around mouth, nose and eyes. and hind quarters, finish 4-7s last.

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

PUPPIES AND KITTENS

Spray back of pet only, then spray on into animal's coat and around mouth.

KENNELS OR PET SLEEPING QUARTERS

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

HORSES AND PONIES

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

MANUFACTURED BY

SPEER PRODUCTS

MEMPHIS, TN