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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

36/17 5-526104

OFFICE OF
PESTICIDES AND TOXIC
SUBSTANCES

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

SEP 25 1997

Attention: Mr. Alfredo Mesa

Subject: Foam Off Flea Killer for Dogs
EPA Registration No. 11715-232
Your letter of May 28, 1997

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 you ship your product:

1. On the Right Panel, restructure use directions as follows:

DIRECTIONS FOR USE

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

PRE-TREATMENT DIRECTIONS

READ ENTIRE LABEL BEFORE EACH USE

USE ONLY ON DOGS TO KILL FLEAS: Do not use on animals under 12 weeks.

SPECIAL ANIMALS

Consult ... animals.

ADVERSE REACTION INFORMATION

Sensitivities ... CDT.

APPLICATION DIRECTIONS

Shake ... sores.



REAPPLICATION DIRECTIONS

Do ... 7 days.

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,

DBP

Dan Peacock, Biologist
Insecticide-Rodenticide Branch
Registration Division (7504C)

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

Peacock Disk 14:A:\Rotenone\11715.232:305-5407,-6600:9/24/97

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

CAUTION

May be harmful if swallowed, absorbed through the skin, or inhaled. Avoid contact with skin, eyes, or clothing. Avoid inhalation of spray. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

FIRST AID

If swallowed: Drink or 2 glasses of water and induce vomiting by touching the back of throat with finger. Call a physician or Poison Control Center. Do not induce vomiting or give anything by mouth to an unconscious person.

If Inhaled: Remove victim to fresh air. Apply artificial respiration, preferably mouth-to-mouth, if indicated.

In in Eyes: Flush with plenty of water. Get medical attention.

If on Skin: Remove contaminated clothing. Wash skin with soap and water. Launder clothes before reuse.

ENVIRONMENTAL HAZARDS

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.

PHYSICAL OR CHEMICAL HAZARDS

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

**FOAM-OFF FLEA KILLER
FOR DOGS**

- * **FOAM SHAMPOO**
- * **DESTROYS FLEAS AS IT CLEANS,**
- * **DEODORIZES, BEAUTIFIES**
- * **PERFECT FOR ALL-WEATHER**
- * **BATHING**
- * **CONTAINS LANOLIN**
- * **KILLS FLEAS AS IT DEODORIZES AND**
- * **GLOSSES THE HAIR**

ACTIVE INGREDIENTS:

Rotenone0.125%
Other Associated Resins0.250%
Butoxypolypropylene Glycol3.600%

INERT INGREDIENTS96.025%

TOTAL100.000%

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

See Left Panel for Additional Precautionary
Statements

EPA Reg. No. 11715-232

EPA Est. No. 11715-TN-1

Manufactured By
SPEER PRODUCTS, INC.

P.O. Box 18993

Memphis, TN 38184

ACCEPTED
WITH COMMENTS
in EPA Letter Dated:

c:\mepul\reg232 pub (5/27/97)

READ ENTIRE LABEL BEFORE EACH USE

USE ONLY ON DOGS

Do not use on animals under 12 weeks.

Consult a veterinarian or call this Company Hotline at 901-362-1950, Monday thru Friday, 8 a.m. - 4:30 p.m. CDT, before using this product on debilitated, aged, pregnant, nursing or medicated animals.

Sensitivities may occur after using ANY pesticide product for pets. If signs of sensitivity occur, bathe your pet with mild soap and rinse with large amounts of water.. If signs continue, consult a veterinarian immediately, or call Speer Products at 901-362-1950, Monday thru Friday, 8 a.m. - 4:30 p.m. CDT.

DIRECTIONS FOR USE

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

APPLICATION DIRECTIONS

Shake thoroughly before each use. Screw off protective top. Hold can in upside down position close to pet's hair, press nozzle to either side to release a puff of foam.

Rub foam into animal's fur thoroughly, including head (except eyes, mouth, and nose), back, sides, legs, ears, and tail. Avoid any sores.

REAPPLICATION DIRECTIONS

Do not reapply product for 7 days.

STORAGE AND DISPOSAL

Storage: Store on only in a cool, dry place inaccessible to children and pets.

Disposal: When empty, replace cap, securely wrap in newspaper, and discard in trash. Do not incinerate or puncture.

SEP 25 1997

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

11715-232

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