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FEB 04 1998

Bill Washburn Regulatory Affairs Manger Speer Products P.O. Box 18993 Memphis, TN 38191

Dear Mr. Washburn:

Subject:

Wipe-A Fly Protectant

EPA Reg. No. 11715-233

Your submission dated 6/9/97

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments listed below. Five copies of the finished labeling must be submitted prior to releasing the product for shipment.

Add to the Precautionary Statements the following: Wash thoroughly with soap and water after handling.

Revise the Statements of Practical Treatment to read as follows:

If Swallowed: Call a doctor or get medical attention. Do not induce vomiting. Do not give anything by mouth to an unconscious person. Avoid alcohol.

If in Eyes: Flush eyes with plenty of water. Get medical attention if irritation persists. If on Skin: Wash with plenty of soap and water. Get medical attention if irritation persists If Inhaled: Move victim to fresh air. If not breathing, give artificial respiration, preferably mouth to mouth. Get medical attention.

Add to the Physical and Chemical Hazards the word "Combustible".

Net Contents for a liquid product must be stated in fluid ounces.

Revise the Environmental Hazards Statement to read:

This product is highly toxic to fish. Do not apply directly to water, or to areas where

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surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water by cleaning of equipment or disposal of equipment washwaters.

Add immediately below the Storage and Disposal heading the following: Do not contaminate water, food, or feed by storage and disposal.

Revise the Disposal statement to read as follows: Securely wrap original container in several layers of newspaper and discard in trash.

At your discretion, you may change the headings "inert ingredients" to "other ingredients" and "Statement of Practical Treatment" to "First Aid".

If you have questions, please call Ann Sibold at 703 305-6502.

Sincerely,

Marion J. Johnson, Jr.

Product Manager 3 Insecticide Branch

Registration Division (7505C)

FRONT LABEL

MACCEPTALISM COMMENTS IN EPA Lonor Dates

Under the Padred Insertiable, Propieties, and Backensteise Art ne management, for the posticide registered under EPA Rog. No. 11715-233

WIPE - A FLY PROTECTANT

(After long-standing

non-use, mix contents

by inverting several

times)

Just wipe it on Horses, Ponies, and Show Stock Repels Horse Flies, House Flies, Stable Flies, Deer Flies, Gnats and Mosquitoes. Effective for hours!

KEEP OUT OF REACH OF CHILDREN CAUTION

SEE BACK PANEL FOR ADDITIONAL CAUTIONS

NET CONTENTS ___ OZ

(BACK PANEL)

WiPE Fly protectant is specially formulated for use on valued race horses and fine show horses, but will prove of equal value to pleasure riders seeking effective long-lasting fly protection for their animals. WiPE gets results, actually helps in the removal of dirt and dandruff. Imparts a high sheen to the hair when brushed out. And, it is pleasant to use. Has a light, bright, pleasing fragrance.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Harmful if swallowed. Avoid contact with eyes, mucous membranes and skin. Avoid contamination of food. Avoid excessive amounts of WIPE on your horses. Do not wet the hide.

STATEMENTS OF PRACTICAL TREATMENT

IF SWALLOWED: Do not induce vomiting. Immediately give large quantities of water. Do not give anything by mouth to an unconscious person. Seek medical attention.

IF IN EYES: Flush with water for at least 15 minutes. Seek medical attention if irritation persists.

IF ON SKIN: Wash with soap and water. Wash contaminated clothing before reuse.

IF INHALED: Move individual to fresh air. Seek medical help if irritation persists.

ENVIRONMENTAL HAZARDS

This product is highly toxic to fish. Do not apply directly to water or wetlands (swamps, bogs, and potholes). Drift from treated areas may be hazardous to organisms in adjacent aquatic sites. Do not contaminate water when disposing of equipment washwaters.

PHYSICAL AND CHEMICAL HAZARDS

Do not use or store near heat or open flame.

DIRECTIONS FOR USE SHAKE WELL BEFORE USING

It is a violation of federal law to use this product in a manner inconsistent with its labeling. Before application, brush animal to remove loose dust, dirt and debris. Moisten (don't soak) a folded piece of turkish toweling (approximately 12" x 15") with WIPE. Rub briskly against the growth of hair, giving special attention to shanks, legs, shoulders, neck and facial area of horse. Avoid contact with eyes or nostrils. Add more WIPE to toweling as needed. Do not apply more than one to two ounces daily, depending on size of animal. Then groom with a brush.

*To make sure the proper amount of WIPE is transferred to the animal we recommend that cloth used to apply the repellent be kept in an air tight container (such as tine can) between periods of daily use. This will ensure its moistness at the start of daily application.

*Repeated daily applications of WIPE may build up repellency on the animal. Thus its effectiveness may be increased, and gradually enable you to reduce the amount applied daily.

Not for application on horses to be used for food.

- *Best application time is between 8 and 10 a.m. This gives you the best protection for the maximum period of time.
- *Amount of repellent required to do an effective job will vary according to season, temperature, climate, humidity and cleanliness of animal.

STORAGE AND DISPOSAL

STORAGE: Store tightly closed in a cool, dry place inaccessible to children and pets and away from sunlight and heat sources.

DISPOSAL: Do not reuse container. Rinse thoroughly before discarding in trash.

EPA REG. NO. 11715-233

EPA EST. NO 11715-TN-1

Manufactured by: Speer Products Memphis, TN 38118