

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

1715-238  
10/30

21 AUG 1995

Mr. William L. Washburn  
Speer Products Incorporated  
4242 B.F. Goodrich Blvd.  
P.O. Box 18993  
Memphis, Tennessee 38181-0993

Dear Mr. Washburn,

Subject: Amended label for Speer Repellent Towelette I, EPA Reg. No. 11715-238.

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.

Modify the Statement 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 Inhaled: Remove victim to fresh air. If not breathing, give artificial respiration preferably mouth-to-mouth. Get medical attention.

If on Skin: Wash with plenty of soap and water. Get medical attention if irritation persists.

If in eyes: Flush with plenty of water. Get medical attention if irritation persists.

Modify the Precautionary Statements to read as follows:

Harmful if swallowed. Wash thoroughly with soap and water after handling.

Modify the Precautionary Statements to delete the sentence "Avoid contamination of feed and foodstuffs" as this is addressed in the Storage and Disposal Statement.

Move the directions for threading the cap and opening the foil pouch to the Directions for Use.

Add a Pesticide Disposal Statement as follows:

SYMBOL	11715-238						
SURNAME	Washburn						
DATE	8/21/95						

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Pesticide Disposal: Wastes resulting from use of this product may be disposed of on site or at an approved waste disposal facility.


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

The percentages in the ingredient statement must be aligned by the decimal.

Modify the second footnote to the inert ingredients to read as follows: Contains petroleum distillates, xylene, or xylene range aromatic solvent.

A marked-up copy of the label is enclosed. If you have questions, please call Ann Sibold at 703 305-6502.

Sincerely,

  
Richard P. Keigwin, Jr.  
Product Manager 10  
Insecticide & Rodenticide Branch  
Registration Division (7505C)

OPEN by pulling easy-open tear strip to expose resealable edges. REMOVE one towel at a time and use immediately. RESEAL pouch to ensure longevity of remaining towels

(FOIL POUCH ONLY)

## SPEER REPELLENT TOWELETTE I

A ready-to-use Pyrenone<sup>®</sup> Insecticide

KILLS and REPELS

- Kills House Flies, Stable Flies, Horse Flies, Horn Flies, Mosquitoes, Gnats, Lice, Fleas and Ticks
- Acceptable for use on Dairy and Meat Animals and in Dairy Rooms, Milk Rooms and Dairies
- Recommended for use on Dogs, Cats, Small Domestic Animals, Horses, Ponies and other Stable and Barn Animals.

### ACTIVE INGREDIENTS

Pyrethrins .....	0.10%
Piperonyl butoxide, Technical* .....	1.00%
INERT INGREDIENTS** .....	98.9%

\* Equivalent to min. 0.8% (butylcarbityl)(6-propylpiperonyl) ether and 0.2% related compounds

\*\* Contains petroleum distillates, *1,1,1-trichloro-2,2,2-trifluoroethane*, or *pyrene* *large aromatic solvent*  
Pyrenone<sup>®</sup> is a registered trademark of Roussel Uclaf Corporation

KEEP OUT OF REACH OF CHILDREN

CAUTION

See side (back) panel for additional precautions.

Net Contents: \_\_\_\_\_ Fl. oz. ( \_\_\_\_\_ Wipes)

EPA Reg. No. 11715-238

EPA Est. No. 11715-TN-1

*Call a doctor or get medical attention. Do not induce vomiting. Do not give anything by mouth to an unconscious person. Avoid alcohol.*  
Manufactured By: Speer Products  
P.O. Box 18993  
Memphis, TN 38181-0993

*If not breathing, give artificial respiration, preferably mouth-to-mouth. Get medical attention.*

### STATEMENT OF PRACTICAL TREATMENT

If Swallowed: ~~Do not induce vomiting.~~ Call a physician or Poison Control Center. If Inhaled: Remove victim to fresh air. ~~Apply artificial respiration if indicated.~~ If on Skin: Wash with <sup>plenty</sup> soap and water. If in Eyes: Flush with plenty of water. Get medical attention if irritation persists. *Get medical attention if irritation persists.*

*Wash the*  
PRECAUTIONARY STATE

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if swallowed. ~~Avoid contact with~~ foodstuffs. Do not use on puppies or kittens under six months of age. Do not use on old, sick or debilitated animals. Do not apply in eyes.

ENVIRONMENTAL HAZARDS

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

Cap Threading Instructions: Remove entire cap from container and discard in appropriate place. Locate the first wipe in the container through center of cap. Place cap firmly back onto container. Foil Pouch Instructions (multiple towelette packages): Remove towelette from pouch, exposing resealable inner pouch. Pull edges of inner pouch to remove towelette. Remove towelette from inner pouch, then reseal pouch to preserve product quality. Foil Pouch Instructions (individual packages): Tear corner of pouch. Remove towelette and use.

DIRECTIONS FOR USE

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

To protect dogs, cats, small domestic animals, horses, ponies, and other stable and barn animals from horn flies, house flies, and gnats; First brush animal to remove excess dirt. Then apply the animal to apply a light coating sufficient to wet the hair. To control stable flies, horse flies and deer flies: Rub the animal sufficiently to wet the hair. Do not soak the hide. Repeat as necessary for protection. To control blood sucking lice: Apply to the animal's face and around eyes and ears. Repeat every two to three weeks as required. Repeat after application.

*Wastes resulting from use of this product should be disposed of properly.*  
STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal. Storage: Store in a cool, dry place away from heat and direct sunlight.

Disposal: Do not reuse container (pouch). Wrap with newspaper and place in trash collection. Consult local authorities for approved alternative procedures. *See container in several layers of newspaper.* Buyer assumes all risks of use, storage and handling in accordance with the directions contained herein.

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ACCEPTED  
with COMMENTS  
In EPA Letter Dated

21 AUG 1995

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

11765-238

F. H. H.