

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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 II, EPA Reg. No. 11715-241.

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 physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. If person is unconscious, do not give anything by mouth and do not induce vomiting.

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.

Add a Pesticide Disposal Statement as follows:

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

CONCURRENCES

SYMBOL	Modify the Container Disposal Statement to read as follows:						
SURNAME	<i>R. A. ...</i>						
DATE	<i>8/21/95</i>						

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Securely wrap original container in several layers of newspaper and discard in trash.

The Net Contents must be expressed in U.S. units of measurement.

The statement "Buyer assumes all risk of use..." is not an environmental statement and should be moved from the Environmental Hazards Statement to an appropriate place on the label.

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

Sincerely,



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

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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 II

A Ready-To-Use Wipe-on Insecticide

KILLS AND REPELS:

FLEAS, TICKS, LICE, DEER TICKS, GNATS, MITES, HOUSE FLIES, STABLE FLIES, HORSE FLIES, DEER FLIES, HORN FLIES AND MOSQUITOES.

Recommended for Use on Dogs, Cats, Rabbits, Hamsters, Gerbils, Guinea Pigs, Horses, Ponies and other Stable and Barn Animals:

DEODORIZES AND CONDITIONS

ACTIVE INGREDIENTS:

Pyrethrins	0.116%
Piperonyl Butoxide, Technical*	1.161%
N-Octyl bicycloheptene dicarboximide**	0.387%
INERT INGREDIENTS	98.336%
TOTAL	100.00%

*Equivalent to min. 0.929% (butylcarbityl) (6-propylpiperonyl) ether and 0.232% related compounds.

**MGK 264 INSECTICIDE SYNERGIST

KEEP OUT OF REACH OF CHILDREN
CAUTION

See side panel for additional precautions.

NET CONTENTS: wiper(s) gms)

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.

11715-241

EPA Reg. No. 11715-241

EPA Est. No. 11715-TN-1

Manufactured by
SPEER PRODUCTS
P.O. BOX 18993
MEMPHIS, TN 38181

DIRECTIONS FOR USE

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

CAP THREADING INSTRUCTIONS: Remove entire roll. Locate the first wipe in the center of roll. Thread wipe through cap. Place cap firmly back onto container. Pull wipe up to expose one wipe.

FOIL POUCH INSTRUCTIONS (multiple towellets): Pull corner of outside pouch, exposing resealable inner pouch. Pull pouch apart to expose towLETTE. Remove towLETTE from pouch immediately to preserve product quality.

FOIL POUCH INSTRUCTIONS (individual towLETTE): Pull corner of pouch. Remove towLETTE and dispose of properly.

ON ANIMALS: To protect animals from horn flies, fleas, ticks, mites, deer ticks and gnats: First brush animal to remove dirt and dust. Apply a light coating sufficient to wet animal's hair. To control stable flies, horse flies and deer flies: Apply spray but not to soak the hide. Recommended for use on face and ears. Repeat as necessary to give continued protection. To control lice: Apply wipe lightly to infested areas. Repeat every three weeks as required.

Wash hands thoroughly after application.

STORAGE AND DISPOSAL

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

Disposal: Do not reuse container. Wrap and put in several layers of newspaper and discard in trash.

Consult Federal, State or local disposal authorities for procedures.

Securely wrap original container in several layers of newspaper and discard in trash.

Pesticide wastes resulting from use of this product should be disposed of on site at an appropriate facility.

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

wash thoroughly with soap and water after handling.

CAUTION

Harmful if swallowed. ~~Avoid contamination of feed and foodstuffs.~~ Do not use on kittens or puppies under 6 weeks of age. Do not use on old, sick or debilitated animals. Do not apply to animal's genitalia or get in eyes.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Keep out of lakes, streams or ponds. Do not contaminate water by disposal of wastes. Buyer assumes all risks of use, storage or handling of this material not in strict accordance with directions given herewith.

Statement of Practical Treatment

If swallowed: Call a physician or Poison Control Center.
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.

Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. If person is unconscious, do not give anything by mouth and do not induce vomiting.

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amended label

inserts.

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