

11715-250

08/04/2003

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

AUG 4 2003

William L. Washburn  
Regulatory Affairs Manager  
Speer Products Inc.  
4242 B.F. Goodrich Blvd  
Memphis, TN 38118

Subject: Label Amendment: 2001-1 First Aid and Storage and Disposal  
Elite Flea and Tick Powder II (Carbaryl)  
EPA Reg. No. 11715-250  
Submission dated April 4, 2003, **accepted with comments**

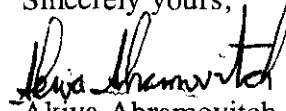
Dear Mr. Washburn:

The revised labeling referenced to above, submitted in connection with the registration under the Federal Insecticide, fungicide, and Rodenticide Act (FIFRA) as amended, is accepted with the following comments:

- 1) Revise the Precautionary Statements and add " Avoid breathing dust. Wash hands thoroughly with soap and water after handling remove clothing and wash clothing before reuse. Do not contaminate water, food or feed with this product"
- 2) The 30 days prohibition of treating pets with cholinesterase inhibiting pesticides is in contradiction with the "repeat every week if needed"-Revise the re-treatment directions to "Do not reapply this product within 30 days".
- 3) The Note to Physician should be updated to read "Carbaryl is an N-methyl carbamate insecticide which is a cholinesterase inhibitor. Specific antidote consists of atropine. Narcotics and other sedatives should not be used. Drugs like 2-PAM (pyridine-2-aldoxime methiodide) are NOT recommended.
- 4) Add to the Directions for use "This product must not be applied by children or when children are present".

A stamped copy "accepted with comments" of the label is enclosed for your records.  
Please submit two (2) copies of the final printed before shipment. If you have any questions please call me at (703) 308-8328.

Sincerely yours,



Akiva Abramovitch, Ph.D.

Chemist

Insecticide-Rodenticide Branch

Registration Division (7505C)

**ELITE FLEA & TICK  
POWDER II  
FOR CATS AND DOGS  
(Over 12 Weeks of Age)**

**KILLS FLEAS AND TICKS**

**ACTIVE INGREDIENTS:**

- Pyrethrins .....0.10%
- \*Piperonyl Butoxide, Technical .....1.00%
- Carbaryl: (1-Naphthyl N-methylcarbamate) ....12.50%
- Silica Gel .....10.00%
- INERT INGREDIENTS:** .....76.40%
- 100.00%

**KEEP OUT OF REACH OF CHILDREN**

**CAUTION**

See Back Panel for Precautionary Statements

**ACCEPTED**  
**with COMMENTS**  
**In EPA Letter Dated:**  
AUG 2003  
AUG 4 2003  
**NET WEIGHT 0.7**  
Under the Federal Insecticide,  
Fungicide, and Rodenticide Act,  
as amended, for the pesticide  
registered under EPA Reg. No.  
11715-250

EPA Reg. No. 11715-250  
EPA Est. No. 11715-TN-1

**READ ENTIRE LABEL BEFORE EACH USE  
USE ONLY ON DOGS AND CATS**

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

**CAUTION**

Causes moderate eye irritation. Harmful if swallowed or absorbed through skin. Avoid contact with eyes, skin or clothing. Wash thoroughly after handling. Do not use on nursing kittens or puppies. Do not use on kittens or puppies less than 12 weeks of age. 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.

Do not use this product on animals simultaneously or within 30 days before or after treatment with or exposure to cholinesterase inhibiting drugs, pesticides or chemicals. However, flea and tick collars may be immediately replaced.

FIRST AID	
<b>IF IN EYES:</b>	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>IF SWALLOWED:</b>	<ul style="list-style-type: none"> <li>• Call poison control center or doctor immediately for treatment advice.</li> <li>• Have person sip a glass of water if able to swallow.</li> <li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>

<b>IF ON SKIN OR CLOTHING:</b>	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
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**HOT LINE NUMBER**

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-877-757-4943 for emergency medical treatment information.

**NOTE TO PHYSICIAN AND VETERINARIAN**

Carbaryl is a cholinesterase inhibitor. Atropine by injection is antidotal.

**USER SAFETY REQUIREMENTS**

- Wear long-sleeved shirt, long pants, shoes plus socks and household latex or rubber gloves when applying this product.
- Change clothing as soon as possible after use.
- Wash the outside of gloves before removing. As with any pesticide product, wash hands thoroughly immediately after handling and before eating, smoking or using the toilet.

**ENVIRONMENTAL HAZARDS**

This product is extremely toxic to aquatic organisms. Do not apply directly to any body of water. Do not contaminate when disposing of equipment washwaters.

**DIRECTIONS FOR USE**

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

**To control Fleas, Ticks and Lice on Dogs and Cats:**  
Use product only outside or in a well-ventilated area. Wearing household latex or rubber gloves, dust entire animal, avoiding pet's eyes, nose, mouth and genital areas. Rub or brush pet's hair to work dust down to the skin. Rub dust into hair and around feet, pads and between the toes so that they are well treated. This product should not be applied by children. Do not use on pregnant dogs or cats. Do not use on kittens or puppies under 12 weeks of age. Consult a Veterinarian before using this product on debilitated, aged or

medicated animals. Do not reapply product more than once per week.

Dust bedding, kennel and sleeping area regularly. Dust bedding and doghouse using a shaker can or other dust applicator. Do not use more than once per week.

**STORAGE AND DISPOSAL**

**STORAGE:** Store in a cool dry location. Keep cap closed tightly.

**DISPOSAL: If empty:** Do not reuse this container. Place in trash or offer for recycling if available.

**If partly filled:** Call your local solid waste or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

**IN CASE OF EMERGENCY CALL:**

**901/362-1950**

( For Distributor labels phone number will vary)

**MANUFACTURED BY:**

**SPEER PRODUCTS, INC.**

**4242 B.F. GOODRICH BLVD.**

**MEMPHIS, TN 38118**

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