



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

AUG 20 2003

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

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 #5 (Carbaryl)
EPA Reg. No. 11715-255
Submission dated May 8, 2003, **accepted with comments**

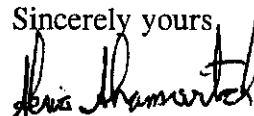
Dear Mr. Washburn:

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 to say "Harmful if swallowed or inhaled. Avoid breathing dust. Avoid contact with eyes, skin or clothing. Wash hands thoroughly with soap and water after handling. Remove clothing and wash clothing before reuse".
- 2) Revise the re-treatment directions to "Do not reapply this product less than 30 days from the last application" to comply with the 30 days prohibition of treating pets with cholinesterase inhibiting pesticides.
- 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 # 5

KILLS FLEAS, LICE & TICKS ON DOGS & CATS

Formulated for the control of Fleas, Ticks (including Ticks which transmit Lyme Disease) and Lice. Pleasantly scented to aid in the elimination of "animal odors".

ACTIVE INGREDIENTS:

Carbaryl (1-naphthyl N-methyl-carbamate).....	5.00%
Pyrethrins.....	0.10%
*Piperonyl Butoxide, Technical.....	1.00%
INERT INGREDIENTS:	93.90%
	100.00%

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

KEEP OUT OF REACH OF CHILDREN

CAUTION

See Back Panel for Precautionary Statements

NET CONTENTS

ACCEPTED with COMMENTS In EPA Letter Dated AUG 20 2003

EPA Est. No. 11715-TN-1 Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No. 11715-355

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

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

CAUTION

Avoid breathing of dust when you apply powder. May be harmful if swallowed. Avoid contact with eyes, skin or clothing. Wash thoroughly after handling. Do not treat puppies or kittens under 12 weeks of age. Keep out of reach of children.

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	
IF INHALED:	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. • Call a poison control center or doctor for further treatment advice.
IF SWALLOWED:	<ul style="list-style-type: none"> • Call poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.

IF IN EYES:	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
IF ON SKIN OR CLOTHING:	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
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	
Carbaryl is a moderate reversible cholinesterase inhibitor. Atropine sulfate is antidotal.	

USER SAFETY REQUIREMENTS
<ul style="list-style-type: none"> • 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 outside of gloves before removing. As with any pesticide product, wash hands thoroughly immediately after handling and before eating, smoking or using the toilet.

DIRECTIONS FOR USE

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

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. 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, nursing, or medicated animals.

FOR CONTROL OF FLEAS, TICKS AND LICE:
Dust pet liberally by rubbing dust into animal's hair. Begin at tail and work toward the head. Take care not to get dust in animal's eyes, nose or mouth. Be sure to dust paws and between toes. Dust bedding, kennels and sleeping quarters using a shaker can or other dust applicator. Do not reapply more than once a week.

STORAGE AND DISPOSAL

STORAGE: Store in a cool, dry place. 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 agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

THIS BOTTLE IS FILLED BY WEIGHT NOT BY VOLUME. YOU CAN BE ASSURED OF PROPER WEIGHT EVEN THOUGH SOME SETTLING OF CONTENTS NORMALLY OCCURS DURING TRANSPORTATION AND HANDLING.

IN CASE OF EMERGENCY CALL:

901/362-1950

(For Distributor labels phone number will vary)

MANUFACTURED BY:

SPEER PRODUCTS

4242 B. F. GOODRICH BLVD.

MEMPHIS, TN 38118