

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



OFFICE OF
PREVENTION, PESTICIDES,
AND TOXIC SUBSTANCES

March 21, 2008

Pride Johnson
Counter Assault
120 Industrial Court
Kalispell, MT 59901

Dear Mr. Johnson:

Subject: Submission of revised label
Counter Assault Bear Deterrent
EPA Registration No. 55541-2
Your e-mail submission dated 3/4/08

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, is acceptable with the following comments:

- On the insert card, header card, and any other instances where it appears, change "EPA # 55541-2" to "EPA **Registration # 55541-2.**" "EPA **Reg. # 55541-2**" or "EPA **Reg. No. 55541-2**" is also acceptable.
- For the 8.1 ounce (230 g) product size, change all duration-of-spray claims from 7.2 to 7.1 seconds so the statement reads, "The canister empties in approximately 7.1 seconds." This change is based on data submitted to the Agency by Counter Assault, and was also required in Agency correspondence dated 2/11/08.
- For the 10.2 ounce (290 g) product size, change all duration-of-spray claims from 9.2 to 8.2 seconds so the statement reads, "The canister empties in approximately 8.2 seconds." This change is based on data submitted to the Agency by Counter Assault, and was also required in Agency correspondence dated 2/11/08.
- On both the 8.1 ounce and 10.2 ounce canisters, under Storage and Disposal, add the following, bolded text so the statement reads:

DISPOSAL: DO NOT PUNCTURE OR INCINERATE!

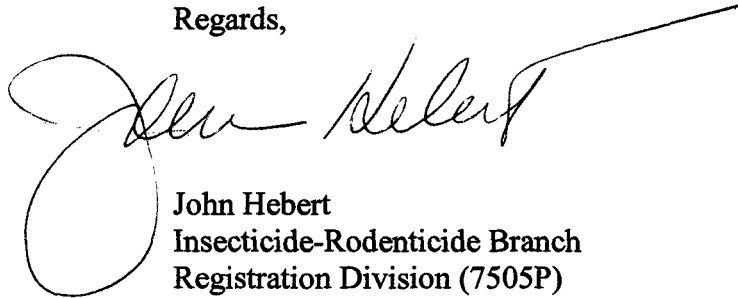
Non-Refillable Container. Do not reuse or refill this container. Offer for recycling if available.

If empty: Press valve to release...

- The alternate brand names “Magnum 290 Bear Deterrent” and “Magnum 290” are acceptable. Please note, however, that only labels bearing the primary brand name, “Counter Assault Bear Deterrent,” will be stamped.

A stamped copy is enclosed for your records. Please submit two copies of your final printed labeling before you release the product for shipment. Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). If you have any questions, please Julie Chao at (703) 308-8735 or chao.julie@epa.gov.

Regards,



John Hebert
Insecticide-Rodenticide Branch
Registration Division (7505P)

Enclosure

PRECAUTIONARY STATEMENTS
Hazards to Humans and Domestic Animals

DANGER:

May cause irreversible eye damage if sprayed in the eye at close range. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Strongly irritating to nose and skin. Do not get in eyes, on skin, or on clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

FIRST AID:

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses after the first 5 minutes, then continue rinsing eye. Call poison control center or doctor for treatment advice. Have product container with you when calling or going for treatment. For emergency medical treatment information call 1-800-535-5053.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call poison control center or doctor immediately for treatment advice.

PHYSICAL OR CHEMICAL HAZARDS:
Extremely flammable. Contents under pressure. Keep away from fire, sparks and heated surfaces. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

STORAGE & DISPOSAL

STORAGE: STORE IN A COOL DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F nor below 32°F. Do not store in hot vehicle or in direct sunlight.

DISPOSAL: DO NOT PUNCTURE OR INCINERATE! If empty: Press valve to release all pressure then place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency for disposal instructions.

Disclaimer: To the extent allowable by law, Counter Assault shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product.

ACCEPTED
with **COMMENTS**
In EPA Letter Dated:

MAR 21 2008

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

55541-2

COUNTER ASSAULT®

BEAR DETERRENT

GRIZZLY TOUGH PEPPER SPRAY

NOT FOR USE
ON HUMANS

TO DETER BEARS FROM
ATTACKING HUMANS

KEEP OUT OF REACH OF CHILDREN

DANGER

DO NOT SEEK OUT ENCOUNTERS WITH BEARS. THIS PRODUCT IS A BEAR ATTACK DETERRENT WHICH MAY PROTECT USERS IN SOME UNEXPECTED CONFRONTATIONS WITH BEARS BUT MAY NOT BE EFFECTIVE IN ALL SITUATIONS OR PREVENT ALL INJURIES. READ THIS ENTIRE LABEL BEFORE TAKING THIS PRODUCT INTO AREAS WHERE BEARS MIGHT BE ENCOUNTERED. SEE SIDE PANELS FOR FIRST AID AND PRECAUTIONARY STATEMENTS.

Active Ingredient:

Capsaicin and related capsaicinoids*	2.0%
(Other Ingredients)	98.0%
TOTAL	100.0%

*Derived from Oleoresin of Capsicum

Manufactured by
Bushwacker Backpack and Supply Co., Inc.
dba COUNTER ASSAULT
120 Industrial Court, Kalispell, MT 59901
1-800-695-3394 • (406) 257-4740
CHEMICAL EMERGENCY: 1-800-535-5053

NET CONTENTS: 8.1 ounces (230g)

EPA Registration #55541-2

EPA Est No. 055541-MT-001



DIRECTIONS FOR USE:

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

USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to attack humans. Do not spray this product on objects, tents, or humans; such use has no deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. Keep safety clip in place except when practicing with or using the product. Do not eat or allow to be eaten any food or feed materials which may have become contaminated with this product.

This product has a range of up to 30 feet (9 meters). The canister empties in approximately 7.2 seconds.

APPLICATION DIRECTIONS: Special procedures must be followed to arm the container, apply the product and restore the safety clip to disarm the container. Before taking this product into bear country, read the directions below and familiarize yourself with these procedures. If you test-fire this container, make sure the wind is at your back and depress actuator tab for no more than half a second. Do not test-fire in area inhabited by bears. If test-fired, clean nozzle and can with soap and water to remove residue from can. If you have not used this product before, you should obtain a Counter Assault training can and practice with it until you can perform these activities quickly and accurately.

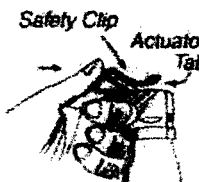
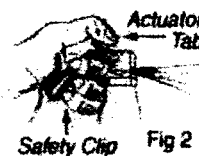
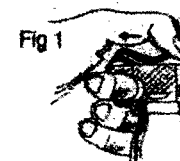
To Arm and Apply

Designed for one-hand operation. Place forefinger through hole in handle with thumb on safety clip cut. With thumb, pull safety clip straight back and off (fig 1).

Depress actuator tab for burst of spray (fig 2). Aim at face and eyes of bear. Depress actuator tab for 1-2 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

To Disarm

Replace safety clip by pushing firmly with thumb until audible "snap" is heard (fig 3). Check to see if safety is completely in place. No gap should be visible between actuator handle and safety clip.



2102 P.E. 1012

3/7

PRECAUTIONARY STATEMENTS
Hazards to Humans and Domestic Animals

DANGER:

May cause irreversible eye damage if sprayed in the eye at close range. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Strongly irritating to nose and skin. Do not get in eyes, on skin or on clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

FIRST AID:

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses after the first 5 minutes, then continue rinsing eye. Call poison control center or doctor for treatment advice. Have product container with you when calling or going for treatment. For emergency medical treatment information call 1-800-535-5053.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call poison control center or doctor immediately for treatment advice.

PHYSICAL OR CHEMICAL HAZARDS: Extremely flammable. Contents under pressure. Keep away from fire, sparks and heated surfaces. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

STORAGE & DISPOSAL

STORAGE: STORE IN A COOL DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F nor below 32°F. Do not store in hot vehicle or in direct sunlight.

DISPOSAL: DO NOT PUNCTURE OR INCINERATE! If empty: Press valve to release all pressure then place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency for disposal instructions.

Disclaimer: To the extent allowable by law, Counter Assault shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product.

COUNTER ASSAULT®
BEAR DETERRENT
GRIZZLY TOUGH PEPPER SPRAY



NOT FOR USE ON HUMANS
TO DETER BEARS FROM ATTACKING HUMANS
KEEP OUT OF REACH OF CHILDREN
DANGER

DO NOT SEEK OUT ENCOUNTERS WITH BEARS. THIS PRODUCT IS A BEAR ATTACK DETERRENT WHICH MAY PROTECT USERS IN SOME UNEXPECTED CONFRONTATIONS WITH BEARS BUT MAY NOT BE EFFECTIVE IN ALL SITUATIONS OR PREVENT ALL INJURIES. READ THIS ENTIRE LABEL BEFORE TAKING THIS PRODUCT INTO AREAS WHERE BEARS MIGHT BE ENCOUNTERED. SEE SIDE PANELS FOR FIRST AID AND PRECAUTIONARY STATEMENTS.

Active Ingredient:	
Capsaicin and related capsaicinoids*	2.0%
Other Ingredients	98.0%
TOTAL	100.0%

*Derived from Oleoresin of Capsicum

Manufactured by
Rushwacker Backpack and Supply Co., Inc.
dba COUNTER ASSAULT

120 Industrial Court, Kalispell, MT 59901
1-800-695-3394 • (406) 257-4740

CHEMICAL EMERGENCY 1-800-535-5053

NET CONTENTS: 10.2 ounces (290g)

EPA Registration #55541-2

EPA Est. No. 055541-MT-001

DIRECTIONS FOR USE.

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

USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to attack humans. Do not spray this product on objects, tents, or humans; such use has no deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. Keep safety clip in place except when practicing with or using the product. Do not eat or allow to be eaten any food or feed materials which may have become contaminated with this product.

This product has a range of up to 32 feet (10 meters). The canister empties in approximately 9.2 seconds.

APPLICATION DIRECTIONS: Special procedures must be followed to arm the container, apply the product and restore the safety clip to disarm the container. Before taking this product into bear country, read the directions below and familiarize yourself with these procedures. If you test-fire this container, make sure the wind is at your back and depress actuator tab for no more than half a second. Do not test-fire in area inhabited by bears. If test-fired, clean nozzle and can with soap and water to remove residue from can. If you have not used this product before, you should obtain a Counter Assault training can and practice with it until you can perform these activities quickly and accurately.

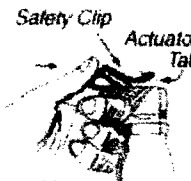
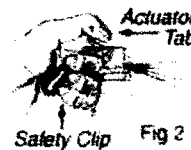
To Arm and Apply

Designed for one-hand operation. Place forefinger through hole in handle with thumb on safety clip curl. With thumb, pull safety clip straight back and off (fig 1).

Depress actuator tab for burst of spray (fig 2). Aim at face and eyes of bear. Depress actuator tab for 1-2 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

To Disarm

Replace safety clip by pushing firmly with thumb until audible 'snap' is heard (fig 3). Check to see if safety is completely in place. No gap should be visible between actuator handle and safety clip.



EXP 2012

L/h

"Grizzly Tough"

DEVELOPED IN CONJUNCTION WITH THE UNIVERSITY OF MONTANA

Pepper Spray

EPA #555412



- Works on all bear species to deter bears from attacking humans
- Needs no shaking



Glow in the dark safety wedge with tie string

Sprays to 30 feet; 1.2 seconds of spray time (230g)
Sprays to 32 feet; 0.2 seconds of spray time (230g)



Developer of high emission "atomized" fire extinguisher style spray used in bear deterrents.
(see back of card)

NET CONTENTS:
8.1 ounces (230g)
ofgrnd@comtexasant.com

Manufactured by:
Bushwacker Backpack and Supply Co., Inc.
dbs COUNTER ASSAULT
120 Industrial Court, Westport, MT 59901
1-800-858-3394 • (406) 257-4740
CHEMICAL EMERGENCY
1-800-858-8083

Item # CA-12M/ci
7 220314 14291 9

PRODUCED BY A GRIZZLY ENCOUNTER SURVIVOR!

original@counterassault.com

In the early 1990's, bear biologists were researching effective bear deterrents. The result of this research was the development of an atomized spray and led to the creation of Counter Assault.

Pride Johnson, President & Chemist of Counter Assault successfully survived a grizzly encounter with Counter Assault Bear Deterrent. The encounter was immediately stopped.

COUNTER ASSAULT BEAR DETERRENT PEPPER SPRAY

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

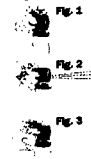
USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to attack humans. Do not spray this product on objects, tents, or humans; such use has no deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. Keep safety clip in place except when practicing with or using the product. Do not eat or allow to be eaten any food or feed materials which may have become contaminated with this product.

This product has a range of up to 30 feet (9 meters) (230g canister) and 22 feet (6.7 meters) (290g canister). The canister empties in approximately 7.2 seconds (230g canister) and 6.2 seconds (290g canister).

APPLICATION INSTRUCTIONS: Special procedures must be followed to arm the container, apply the product and restore the safety clip to disarm the container. Before taking this product into bear country, read the directions below and familiarize yourself with these procedures. If you test-fire this container, make sure the wind is at your back and depress actuator tab for no more than half a second. Do not test-fire in areas inhabited by bears. If test-fired, clean nozzle and can with soap and water to remove residue from can. If you have not used this product before, you should obtain a Counter Assault training can and practice with it until you can perform the activities quickly and accurately.

TO ARM AND APPLY: Designed for one-hand operation. Place forefinger through hole in handle with thumb on safety clip cut. With thumb, pull safety clip straight back and off (fig 1). Depress actuator tab for burst of spray (fig 2). Aim at face and eyes of bear. Depress actuator tab for 1-2 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

TO DISARM: Replace safety clip by pushing firmly with thumb until audible "snap" is heard (fig 3). Check to see if safety is completely in place. No gap should be visible between actuator handle and safety clip.



PRECAUTIONARY STATEMENTS: Hazards to Humans and Domestic Animals

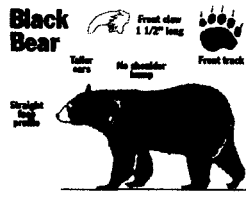
WARNING: May cause irreversible eye damage if sprayed in the eye at close range. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Strongly irritating to nose and skin. Do not get in eyes, on skin, or on clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

FIRST AID:
IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses after the first 5 minutes, then continue rinsing eye. Call poison control center or doctor for treatment advice. Have product container with you when calling or going for treatment. For emergency medical treatment information call 1-800-635-5063.
IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call poison control center or doctor immediately for treatment advice.

PHYSICAL OR CHEMICAL HAZARDS:
Extremely flammable. Contents under pressure. Keep away from fire, sparks and heated surfaces. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

STORAGE & DISPOSAL:
STORAGE: STORE IN A COOL DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F nor below 32°F. Do not store in hot vehicle or in direct sunlight.
DISPOSAL: DO NOT PUNCTURE OR INCINERATE. If empty: Press valve to release all pressure then place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency for disposal instructions.

Disclaimer:
To the extent allowable by law, Counter Assault shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product.



Magnum 290
NET CONTENTS:
10.2 ounces (290g)
original@counterassault.com

Manufactured by:
Bushwacker Backpack and Supply Co., Inc.
dba COUNTER ASSAULT
120 Industrial Court, Kalispell, MT 59901
1-800-695-3394 • (406) 257-4740
CHEMICAL EMERGENCY
1-800-635-5063



"Grizzly Tough" Pepper Spray

Leads to striking

Attacking humans

deter bears from

bear species to

For use on all

Bear Deterrent



US EPA # 55541-2

Sprays to 30 feet; 7.2 seconds of spray time (230 g canister)

Sprays to 32 feet; 9.2 seconds of spray time (290 g canister)



Counter Assault
120 Industrial Court
Kalispell, MT 59901
1-800-695-3394

