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NOV 15 1995

Deer-Off Inc.  
58 High Valley Way  
Stamford, CT 06903

Attention: Ms. Athena Loucas

Subject: Deer-Off Deer Repellent Concentrate  
EPA Registration No. 67356-1  
Your submissions of March 31 and May 16, 1995

Your product chemistry data submitted with your March 31, 1995, letter are acceptable. However, you need to submit them in the proper format (PR Notice 86-5) so that we can assign an MRID number to them and so that you can reference them in the future.

We completed review of the acute toxicity data [MRID No. 433114-01 (Eye Irritation, Toxicity Category III) and MRID No. 433114-02 (Skin Irritation, Toxicity Category IV)] conducted on Deer-Off Deer Repellent Concentrate. The labeling comments below, which need to be implemented within 18 months of receipt of this letter, reflect the results of those studies.

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable provided that you make the following changes before you release product for shipment:

- 1. Revise your ingredient statement as indicated below to characterize better the active ingredients in this formula.

Active Ingredients

Putrescent Whole Eggs . . . . .	25.0000%
Capsaicin and Related Capsaicinoids*	0.0045%
Garlic . . . . .	0.0050%
Inert Ingredients	74.9905%
*Derived from hot chili sauce	

2. Revise your CAUTION section as follows:

CAUTION: Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling.

FIRST AID

IF IN EYES: Flush eyes with plenty of water. Call a physician if irritation persists.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

A stamped copy of the labeling is enclosed for your records.

Sincerely yours,



Robert A. Forrest  
Product Manager (14)  
Insecticide-Rodenticide Branch  
Registration Division (H7504C)

- Enclosures: 1. Stamped label
- 2. A-29 Enclosure

Peacock WP#6:A:67356-1:305-5407,-6600:11/15/95

# DEER-OFF®

## DEER REPELLANT CONCENTRATE

Repels white-tailed deer that browse upon yew, aborvitae, and Douglas fir plants. Treats 300-400 ornamental shrubs 4 ft. high or approximately 3,000-4,000 sq. ft. depending on surface conditions and size of plantings.

### Active Ingredients:

Putrescent Whole Eggs	.....	25.0000%
Capsaicin	.....	0.0045%
Garlic	.....	0.0050%
Inert Ingredients	.....	74.9905%

STORE IN COOL PLACE  
OR REFRIGERATE

SHAKE WELL BEFORE USING  
KEEP OUT OF REACH OF CHILDREN

•••• CAUTION ••••

See back panel for additional precautionary statements

1 Quart (32 oz.)  
Yields Two Gallons

EPA REG. NO.

67356-1

EST. NO.

995-CT-001



ACCEPTED with COMMENTS in EPA Letter 01/22/05

NOV 15 1995

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

## 67356-1 DEER-OFF CONCENTRATE 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 to repel white-tailed deer (*Odocoileus virginianus*) that feed on yew, American aborvitae, or Douglas fir plants. Do not apply it on plants grown to produce human food or animal feed. Do not apply at temperatures below 40°F, when it is windy, or when vegetation is wet.

**MIXING AND DILUTION DIRECTIONS:** Shake container of DEER-OFF Concentrate thoroughly prior to mixing. Mix concentrate with tap water at a ratio of 1 part concentrate to 7 parts water. Use 4 oz. of concentrate and 28 oz. of water to make a quart (32 oz.) of spray mixture. Contents of 1 qt. bottle makes 2 gallons of spray, when mixed with 7 qts of water. **DO NOT OVER-DILUTE THIS PRODUCT.**

**APPLICATION DIRECTIONS:** Shake container of spray mix thoroughly before use. Spray leaves, stems and branches thoroughly from all angles, until run-off or leaves look wet. Treat vulnerable plants at the beginning of each damage season. Repeat treatment after heavy rains, as new growth emerges, and if effects of the previous treatment appear to be waning.

One qt. of concentrate makes enough spray mixture to treat 300-400 ornamental shrubs 4 ft. high or an area of about 3,000-4,000 sq. ft. of treated plants. Surface conditions and sizes of plantings will affect the size of an area that can be treated with a given quantity of spray mixture.

Before large-scale treatments, test product on a small area of each type of plant to be treated to make sure that DEER-OFF will not damage the plant.

### STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

**STORAGE:** Store in a cool, dry area inaccessible to children and pets. Protect from heat and freezing. Keep container closed tightly to prevent evaporation. If spillage occurs, dilute with water and flush away.

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

**CONTAINER DISPOSAL:** Sprayers should be triple-rinsed. All other containers, including mixing containers, must be triple-rinsed, then offered for recycling or reconditioning, or punctured and disposed of in a sanitary landfill, or incinerated, or, if allowed by state and local authorities, burned. If burned, stay out of smoke.

### PRECAUTIONARY STATEMENTS

**HAZARD TO HUMAN AND DOMESTIC ANIMALS**

**CAUTION:** Wash hands, arms, and face with soap and water after use. Avoid contact with eyes, skin or clothing. In case of contact, immediately flush eyes or skin with plenty of water. Get medical attention if irritation persists.

**ENVIRONMENTAL HAZARDS:** Keep out of lakes, streams or ponds. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water by equipment cleaning or waste disposal.

### LIMITED GUARANTEE:

We guarantee to you, the original purchaser, that DEER-OFF will perform as promised on label, if it is applied within six months after date of purchase under normal conditions of use. This warranty shall not apply if product is not stored or not applied in manner described on label. If product is not effective, send us proof of purchase and letter of explanation. We will refund your purchase price. **DEER-OFF shall not be liable for any direct, consequential or incidental loss or damage.** Refund is our sole obligation. If any other warranties are implied by law, such warranties shall be limited to the six-month period of above guarantee. Buyer assumes all risks of use and handling of this product especially when such use and handling are contrary to label instructions or under abnormal conditions.

DEER-OFF, Inc.

58 High Valley Way Stamford, CT. 06903-2714 (203) 968-8485