

NOV 15 1995

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

Attention: Ms. Athena Loucas

Subject: Deer-Off Deer Repellent Spray  
EPA Registration No. 67356-2  
Your submissions of July 21, 1994 and August 3, 1995

Your product chemistry data submitted with your August 3, 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 . . . . .	3.1250%
Capsaicin and Related Capsaicinoids*	0.0006%
Garlic . . . . .	0.0006%
Inert Ingredients	96.8738%
*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.

3. For homeowner sizes of this product, you could revise your "Storage and Disposal" section as follows:

STORAGE AND DISPOSAL

Storage: Store only in original container, in a dry place iraccessible to children and pets.

Disposal: Do not reuse empty container. Rinse thoroughly. Securely wrap in newspaper and discard in trash.

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,

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

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

Peacock WP#6:A:67356-2:305-5407,-6600:11/15/95

343

# DEER-OFF

## DEER REPELLANT SPRAY

Repels white-tailed deer that browse upon yew, aborvitae, and Douglas fir plants. Treats 40-50 ornamental shrubs 4 ft. high or approximately 400-500 sq. ft. depending on surface conditions and size of plantings.

### Active Ingredients:

Putrescent Whole Eggs	3.1250%
Capsaicin	0.0006%
Garlic	0.0006%
Inert Ingredients	96.8738%

**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.)

EPA REG. NO.  
67356-2  
EPA EST. NO.  
067356-CT-001



REGISTERED  
EPA EST. NO. 067356-2  
Under the Federal Insecticide, Fungicide, and Rodenticide Act  
67356-2

## DEER-OFF SPRAY

### DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with the label. **USE RESTRICTIONS:** This product may be used to repel white-tailed deer (Odocoileus virginianus) on yew, American aborvitae, or Douglas fir plants. Do not apply it on plants growing in animal feed. Do not apply at temperatures below 40°F, when it is windy, or when rain is expected. **APPLICATION DIRECTIONS:** Shake container of DEER-OFF spray thoroughly before use. Spray stems and branches thoroughly from all angles, until run-off or leaves look wet. Repeat treatment at the beginning of each damage season. Repeat treatment after heavy rains, as the effects of the previous treatment appear to be waning. A one quart container of DEER-OFF contains enough spray to treat 40-50 ornamental shrubs 4 ft. high or approximately 400-500 sq. ft. of treated plants. Surface conditions and sizes of plants vary. Treat a smaller area of an area that can be treated with a given quantity of spray. Before large-scale treatments, test product on a small area of each type of plant to be 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 frost. Keep container closed tightly to prevent evaporation. If spillage occurs, dilute with water. **PESTICIDE DISPOSAL:** Wastes resulting from use of this product may be disposed of in an approved waste disposal facility. **CONTAINER DISPOSAL:** Sprayers should be triple-rinsed, then offered for recycling, if available, or punctured and disposed of in a sanitary landfill, or, if allowed by state or local regulations, burned, stay out of smoke.

### PRECAUTIONARY STATEMENTS

**HAZARD TO HUMANS AND DOMESTIC ANIMALS**  
**CAUTION:** Wash hands, arms, and face with soap and water after use. Avoid contact with eyes, nose, mouth, and clothing. In case of contact, immediately flush eyes or skin with plenty of water. Get medical attention if necessary. **ENVIRONMENTAL HAZARDS:** Keep out of lakes, streams or ponds. Do not use in areas where surface water is present or to intertidal areas below the mean low 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 specified on the label if applied within six months after date of purchase under normal conditions of use. If product is not stored or not applied in manner described on label, we will not be liable for any direct, consequential or incidental loss or damage. Refund is limited to purchase price. No other warranties are implied by law, such warranties shall be limited to the extent they do not conflict with this guarantee. Buyer assumes all risks of use and handling of this product except as otherwise stated. Handling are contrary to label instructions or under abnormal conditions.

DEER-OFF, Inc.

58 High Valley Way Stamford, CT. 06903-2714 (203) 358-1111

**BEST COPY AVAILABLE**