01/16/2003

United States Environmental Protection Agency

Jean Butler, Regulatory Assistant Speer Products, Inc. 4242 B.F. Goodrich Blvd. Memphis, TN 38118

JAN 1 6 2003

Subject:

Response to PR Notice 2001-1 regarding mandatory revisions to First Aid

statements on Pesticide product labeling and PR Ntoice 2001-6.

Amendment Reference No: 294987

Product Name:

Elite Flea and Tick Dip

Registration Number: 68688-1

Date of Submission: October 7,. 2002

Dear Jean Butler:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), is acceptable subject to the comments listed below. Five copies of the finished labeling must be submitted prior to releasing the product for shipment.

Page 2, directly below the Storage and Disposal box; Change the statement "In 1. case of emergency or for product use information call (901) 362-1950,....." to the following: "For product use information call (901) 362-1950," Emergency contact numbers must be available 24 hours/day 7 days/week.

If you have any questions, you may contact Richard J. Gebken, at (703) 305-6701.

Sincerely,

Joseph Tavano

Richard J. Cabke

Acting Product Manager 10

Insecticide Branch

Registration Division (7505C)

068688-00001 S625093.wpd

CONCURRENCES								
SYMBOL >	H7505C					******************	,,,,,	
SURNAME >	RGEBKEN		******	····				
DATE >	Jan 16, 2003							<u> </u>

EPA Form 1320-1 (12-70)

OFFICIAL FILE COPY

ELITE FLEA AND TICK DIP

FOR DOGS & CATS
KILLS FLEAS, LICE AND TICKS

KEEP OUT OF REACH OF CHILDREN CAUTION SEE BACK PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

EPA Est. No. 11715-TN-1

***Contains petroleum distillate

EPA Reg. No. 68688-01

MANUFACTURED BY: SPEER PRODUCTS, INC. P. O. Box 18993 Memphis, TN 38181-0993

NET CONTENTS _____ oz.

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

DIRECTIONS FOR USE

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

TO KILL FLEAS, LICE AND TICKS: Bathe pet with a quality cleaning shampoo. Dilute 4 ounces of Dip Concentrate with 1 gallon of water. Dip animal into solution, making sure hair is thoroughly wet to the skin. The area around the ears should be sponged thoroughly. Avoid contact of material with eyes and mouth of animal. Do not rinse off. Do not repeat treatment for one week.

Consult a veterinarian before using this product on debilitated, aged, pregnant or nursing animals, or animals on medication.

PRECAUTIONARY STATEMENTS CAUTION

HAZARDS TO HUMANS AND, DOMESTIC ANIMALS: Harmful if swallowed. If swallowed call a physician or poison control center immediately. Do not induce vomiting. Vomiting may cause aspiration pneumonia. Avoid contact with eyes. Do not contaminate food or feedstuffs with this concentrate or dip. Do not treat 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.

ACCEPTED
with COMMENTS
In EPA Letter Dated:
JAN 1 6 2003

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FIRST AID					
IF SWALLOWED	•	lmmediately call			
		a poison control			
, A	-:	center or doctor.			
	• -	Do not induce			
Fe		vomiting unless			
	l	told to do so by a			
		poison control			
	j	center or doctor.			
	•	Do not give any			
		liquid to the			
		person.			
	•	Do not give			
		anything by			
		mouth to an			
		unconscious			
		person.			
IF ON SKIN OR	•	Take off			
CLOTHING		contaminated			
		clothing.			
	•	Rinse skin			
		immediately with			
		plenty of water			
)	for 15-20			
		minutes.			
	•	Call a poison			
		control center or			
		doctor for			
	<u> </u>	treatment advice.			
IF IN EYES	•	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			
	L	continue rinsing			

eye.
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

Contains Petroleum Distillate - Vomiting may cause aspiration pneumonia.

ENVIRONMENTAL HAZARDS: This product is toxic to fish and other aquatic animals. Do not contaminate any body of water with this concentrate or dip or by cleaning of equipment.

PHYSICAL HAZARDS: Do not store or use near heat or open flame.

STORAGE AND DISPOSAL

STORAGE: Store in a cool area away from heat or open flame.

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.

In case of emergency or for product use information call (901) 362-1950, Monday - Friday, 7:30 AM - 4:30 PM, CST (distributors may elect to use their own phone numbers and hours of operation).

NTSVR:\WORD\68688-01amend(10-07-02jb)