

JUN 29 2003

Mr. William L. Washburn
Speer Products, Inc.
P.O. Box 18993
Memphis, TN 39181-0993

Subject: Revised Labeling/PR Notice 2001-1
and PR Notice 2001-6
Elite Flea & Tick Dip for Dogs and Cats
EPA Registration Number: 68688-2
Application Date: November 19, 2002

Dear Mr: Washburn:

The labeling referred to above. Submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments listed below:


Modify the **IF SWALLOWED** statement in the first aid section of the labeling to read:

IF SWALLOWED: 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 the poison control center or doctor.
Do not give anything by mouth to an unconscious person.

Five copies of the finished labeling must be submitted prior to releasing the product for shipment.

A stamped copy of the label is enclosed.

Sincerely,



Marion J. Johnson, Jr.
Product Manager 10
Insecticide Branch
Registration Division (7505c)

ELITE FLEA AND TICK DIP FOR DOGS & CATS

KILLS FLEAS, LICE AND TICKS

May be used with PROBAN

ACTIVE INGREDIENTS:

Pyrethrins.....1.000%
*Piperonyl Butoxide, Technical.....2.000%
**N-Octyl Bicycloheptene
dicarboximide.....3.340%
INERT INGREDIENTS:.....93.66%
100.00%

* Equivalent to 0.54% (butylcarbityl) (6-propylpiperonyl)
ether and 0.13% related compounds.

**MGK 264, Insecticide Synergist

KEEP OUT OF REACH OF CHILDREN

CAUTION

See Back Panel for Additional
Precautionary Statements

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

NET CONTENTS _____ oz.

EPA Est. No. 11715-TN-1
EPA Reg. No. 68688-02

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

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.

FIRST AID

IF SWALLOWED:

- 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.

ACCEPTED
with COMMENTS
In EPA Letter Dated:
JUN 29 2003
Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
68688-2

FIRST AID (Cont'd)

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 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.

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.

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 1 1/2 ounces (3 Tablespoons) of Flea and Tick 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.

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).