7 MAR 1996

William L. Washburn Speer Products, Inc. P.O. Box 18993 Memphis, TN 38181-0993

Dear Mr. Washburn:

Subject: Response to Dipropyl Isocinchomeronate DCI

Elite Aloe Repellent Lotion #8
EPA Registration Number 68688-31
Submission Dated August 5, 1994

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:

- 1. Revise the front panel statement "(not for slaughter)" to ensure that it applies to both Horses and Foals.
- 2. Include the correct EPA Registration Number and EPA Establishment Number on the label.
- 3. Delete the Physical or Chemical Hazards statement heading and the word "None."

A stamped copy of the label is enclosed for your records. Submit three copies of revised final printed labeling prior to releasing product for shipment.

If you have any questions or comments, please contact me at (703) 305-6788.

Sincerely,

RPK_

Richard P. Keigwin, Jr. Product Manager 10 Insecticide-Rodenticide Branch Registration Division (7505C)

ELITE ALOE REPELLENT LOTION #8 With Natural Soothing Aloe, Lanolin, & PABA Sunscreen

> FOR CATS - KITTENS - DOGS - PUPPIES HORSES - FOALS (not for slaughter)

KILLS ON CONTACT And Repels EAR MITES-FLIES-MOSQUITOES-GNATS-FLEAS-TICKS LICE-MANGE MITES On Exposed Skin Surface For 3-5 Days

ACTIVE INGREDIENTS:

Pyrethrins	0.15%
*Piperonyl Butoxide, Technical	1.00%
N-Octyl Bicycloheptene Dicarboximide	0.50%
Di-n-Propyl Isocinchomeronate	1.00%
INERT INGREDIENTS:	97.35%
	\$00.00

*Equivalent to 0.80% of Butylcarbityl 6-propylpiperonyl ether and 0.20% of related compounds.

KEEP OUT OF REACH OF CHILDREN

ACCEPTED With CONSIENTS In EPA Leiter Dated

CAUTION

Under the Fig. of Inscaticing.

See Back Panel for Precautionary Statements as among

registered under Carre

FIN MAR 1996

MANUFACTURED BY: RSR LABORATORIES, INC. POST OFFICE BOX 8700, BRISTOL, TENNESSEE 37620

EPA Est. No. 51793-TN-1

EPA Reg. No. 51793-156

NET CONTENTS ____ OZ

DIRECTIONS FOR USE

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

Do not put lotion directly on broken skin or an open wound. Lotion may be applied on a bandage.

DOGS - PUPPIES - CATS - KITTENS

To Kill and Repel Ear Mites: Clean ear to remove built-up wax and dirt. Gently dry ear with a cotton ball or soft cloth and apply a thin film of lotion. The lotion may be applied daily for 7 to 10 days.

To Kill Ticks: Make sure lotion covers ticks.

To use as a Repellent: Spread lotion lightly on outer and inner surface of the outer ear and between the toes before animals enter infested area. Repeat daily as needed.

HORSES - FOALS (not for slaughter)

To Control Ticks, Gnats, Flies, Mosquitoes and Mange Mites: Before application, remove dirt or debris by brushing or washing with a mild detergent. Allow to completely dry. Apply a light film to affected areas daily, massaging into the skin for 2 to 3 days. Then apply every 3 to 5 days as needed.

STORAGE AND DISPOSAL

STORAGE: Store in a cool, dry area.

DISPOSAL: Do not reuse empty container. Wrap container and put in trash

collection.

PRECAUTIONARY STATEMENT

CAUTION

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Humans: Harmful if swallowed. Avoid breathing vapors. Avoid contact with eyes. In case of contact, immediately flush eyes with plenty of water. Obtain medical attention if irritation persists. If swallowed, do not induce vomiting. Wash hands with soap and water after using.

Animals: Avoid contact with eyes. If in eyes, flush with water. Do not use on meat or milk producing animals.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not apply directly to water.

PHYSICAL OR CHEMICAL HAZARDS

None

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