

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

May 28, 2003

Speer Products
P.O. Box 18993
Memphis, TN 38181-0993

346
17
5-635666

Attention: Mr. Bill Washburn

Subject	Elite Dog & Cat Repellent-R67 EPA Reg. No. 68688-37 Your amended application of April 29, 2003 Our letter of April 7, 2003
Purpose	The purpose of your submission under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) is to revise your Confidential Statement of Formula (CSF) and label according to our April 7, 2003, letter and PR Notices 2001-1 and 2001-6.
Review of CSF	Your CSF dated April 29, 2003, is acceptable. A copy has been placed in our files. All other versions are obsolete.
Label	<p>The label submitted with the above letter, under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) is acceptable, provided that you make the following changes and submit one (1) copy of final printed labeling, including graphics, to us before you release product for shipment. A copy of the stamped label is enclosed for your records.</p> <ol style="list-style-type: none">1. Left justify the subheadings, "HAZARD TO HUMANS AND DOMESTIC ANIMALS" and "PHYSICAL OR CHEMICAL HAZARDS" under your main heading, "PRECAUTIONARY STATEMENTS".2. In your Ingredient Statement, drop the "s" from "Active Ingredients".
Existing stocks	Stocks of existing labels may be used for eighteen (18) months.
Consequence for non-compliance	If these conditions are not complied with, the registrations will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

Questions

If you have questions about this letter, please contact me at 703-305-5407 (by phone), 703-305-6596 (by fax), or peacock.dan@epa.gov (by E-Mail).

Sincerely yours,



Daniel B. Peacock, Biologist
Insecticide-Rodenticide Branch
Registration Division (7504C)

**Letter
location**

Disk 105:A:\MNK\68688-37.5-25-2003, revised label and CSF.wpd, May 28, 2003

[FRONT PANEL]

ELITE DOG AND CAT REPELLENT - R67

A training aid for your own pet. Will
repel dogs and cats for up to 24 hours
when applied daily.

Keeps pets away from furniture, carpet,
trees, shrubs, garbage cans and other
"forbidden areas".

ACTIVE INGREDIENTS:

Methyl nonyl ketone 2.00%

INERT INGREDIENTS: 98.00%
100.00%

KEEP OUT OF REACH OF CHILDREN

CAUTION

See [left/right/side/back] Panel for
Additional Precautionary Statements

NET CONTENTS _____ OZ.

EPA Reg. No. 68688-37
EPA Est. No. 11715-TN-1

[LEFT/RIGHT/BACK PANEL]

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS CAUTION

Causes moderate eye irritation. Avoid
contact with eyes or clothing. Wash
thoroughly after handling.

FIRST AID

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.

IF ON SKIN OR CLOTHING:

- Take off
contaminated
clothing.
- Rinse skin
immediately with
plenty of water for
15-20 minutes.
- Call a poison
control center or
doctor for
treatment advice.

ACCEPTED
with COMMENTS
in EPA Letter Dated

MAY 28 2003

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

68688-37

[LEFT/RIGHT/BACK PANEL]

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.

PHYSICAL OR CHEMICAL HAZARDS

Flammable. Keep away from heat or open
flame. Do not use in the vicinity of pilot
lights.

DIRECTIONS FOR USE

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

USE RESTRICTIONS

Do not use in commercial food processing
or preparation areas. In the home, cover
all exposed food, food processing
surfaces, and utensils during treatment.
Do not spray food or feed crops.

For both indoor and outdoor situations, use
training whenever possible, including
positive (praise) and negative (sharply
spoken word backed up with disciplinary
action) reinforcement.

This product repels dogs and cats for up to
24 hours when applied daily. Keeps pets
away from furniture, carpet, trees, shrubs,
garbage cans/bags, and other "forbidden
areas".

INDOOR USE

Use indoors to break your pet of
undesirable habits such as sleeping on
furniture and rugs or to keep out of
forbidden areas. Always use with

[LEFT/RIGHT/BACK PANEL]

consistent training. Praise your pet for good behavior and scold for bad behavior.

Pretreatment Directions: Before spraying large areas of rugs, fabrics, or plastics, test effect of this product by treating a small, inconspicuous area. This product may stain or soften some fabrics or plastics. To avoid possible damage, spray a piece of cloth lightly and place it on the object or area to be protected.

Application Directions: Spray the object lightly with this product until slightly moistened.

Retreatment Directions: Repeat daily, or as necessary, until undesirable habit is broken.

OUTDOOR USE:

Use outdoors to prevent dogs and cats from disturbing flower beds, areas of lawn, trees, shrubbery, fences, patio furniture, and garbage cans/bags.

NOTE: This product is not likely to break the established urination patterns of dogs unless it is used as a training aid.

Pretreatment Directions: Stray animals are frequently attracted to areas where pets have soiled with feces or urine. To discourage repeat visits, remove any droppings and clean with water.

Application Directions: Do not apply directly to foliage of shrubs or to ornamental, soft-bodied plants. Do not apply to food or feed crops. Lightly spray surrounding soil or apply to a piece of cloth and affix near area to be protected every

[LEFT/RIGHT/BACK PANEL]

day.

Retreatment Applications: Repeat daily, or as necessary, until undesirable habit is broken.

STORAGE AND DISPOSAL

Storage: Store only in a cool, dry place inaccessible to children and pets, away from heat or open flame..

Disposal: Do not Puncture or Incinerate!
If empty: 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.

**MANUFACTURED BY
SPEER PRODUCTS, INC.
4242 B.F. GOODRICH BLVD.
MEMPHIS, TN 38118**

Netserver/Regulatory/SPI labels/68688-labels/68688-37
amended (11/25/02) amend & EPA compliance-4-29-03