6868-56

12/05/2002



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

DEC 5 2002

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

Mr. Bill Washburn Speer Products, Inc. 4242 B.F. Goodrich Blvd. Memphis, TN 38118

Subject:

Amendment Revising Directions for Use and Adding Marketing Claims

SPHSOP-1 Spot-On

EPA Registration Number: 68688-56

Your Submission Dated September 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 below. Two (2) copies of the finished labeling must be submitted prior to releasing the product for shipment. A stamped copy of the label is enclosed for your records.

- 1. The statement "The Horse World's Most Trusted Name®" is acceptable on the label provided it is clear that the statement refers to the distributor company's name and not the product name [Statements comparing a product with other pesticide products are not allowed on pesticide labels].
- 2. The statement "For External Use on Horses Only" must be moved out of the Precautionary Statements. You may include it as an additional bulleted statement on the front panel or move it to the Directions for Use.
- 3. As specified in the Notice of Registration, you must move the following statements from the paragraph under Hazards to Humans and Domestic Animals to the Directions for Use:

"Sensitivities can occur after using ANY pesticide product for animals. If signs of sensitivity occur wash area with mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately."

If you have any questions regarding this action, please contact Susan Stanton of my team at (703) 305-5218.

Sincerely,

George T. LaRocca Product Manager 13 Insecticide Branch

Registration Division (7505C)

Enclosure

SPHSOP-1

SPOT-ON

ACCEPTED with COMMENTS In EPA Letter Dated:

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

PASTURE PROTECTION™ FROM registered under EPA ReBITING FLIES, MOSQUITOES & TICKS 18688-56

- Kills and repels horse flies, deer flies, gnats, mosquitoes, black flies, horn flies, face flies, stable flies and house flies for up to two weeks
- Kills and repels midges, black flies and gnats, vectors that may cause Sweet ltch, for up to two weeks
- Kills and repels mosquitoes on horses
- > Field tested. Protects for up to 14 days
- Sweat and water resistant
- May be used with UltraShield® Brand Residual Insecticide
 & Repellent

FOR USE ON HORSES NOT FOR USE ON FOALS UNDER 12 WEEKS OF AGE

ACTIVE INGREDIENT

* Cis/trans ratio: max 55%[±] cis and min 45%[±] trans

KEEP OUT OF REACH OF CHILDREN CAUTION

SEE BACK PANEL FOR PRECAUTIONARY STATEMENTS READ ALL DIRECTIONS BEFORE USING THIS PRODUCT Speer Products Inc.

4242 B.F. Goodrich Boulevard Memphis, TN 38181

EPA Registration No. 68688-56

EPA Establishment No. 11715-TN-1

NET CONTENTS: 2 x 6 cc applicators (1 month supply for horses) 8 X 6cc applicators (value pack - 8 week supply for horses) (product logo)
Pasture Protection™ from Biting Flies & Mosquitoes
Kills and Repels
Apply to 6 spots on horses for Head to Hoof Protection
The Horse World's Most Trusted Name®

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

FOR EXTERNAL USE ON HORSES ONLY. Harmful if swallowed or absorbed through the skin. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling. Sensitivities can occur after using ANY pesticide product for animals. If signs of sensitivity occur wash area with mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately.

FIRST AID

IF SWALLOWED:

Call a 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 a

poison control center or doctor.

IF ON SKIN OR CLOTHING:

NG: Take off contaminated clothing. Rinse skin immediately

with plenty of water for 15 to 20 minutes. Call a poison control

center or doctor for treatment advice.

IF IN EYES:

Hold eye open and rinse slowly and gently with water for 15 to 20 minutes. Remove contact lenses, if present, after first 5 minutes, then continue rinsing eyes. Call a poison control center

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 the International Poison Control Center at 1-800-628-9653 for emergency medical treatment information.

ENVIRONMENTAL HAZARDS

This product is extremely toxic to fish. Do not apply directly to water, or areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when cleaning equipment or disposing of equipment washwaters.

CHEMICAL HAZARDS

Combustible. Do not use or store near heat or open flame.

STORAGE AND DISPOSAL STATEMENTS

Do not contaminate water, food or feed by storage or disposal

PESTICIDE STORAGE: Store in a cool, dry place. Protect from freezing.

PESTICIDE DISPOSAL: Call your local solid waste agency or [1-800-CLEANUP or equivalent organization] for disposal instructions. Unless otherwise instructed place in trash. Never pour unused product down the drain or on the ground.

CONTAINER DISPOSAL:

Do not reuse empty container. Place in trash.

READ ENTIRE LABEL BEFORE EACH USE DIRECTIONS FOR USE

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

Do not use on horses intended for slaughter Not for use on foals under 12 weeks of age Ready to use, no dilution necessary

Hold tube in upright position pointing away from the user's face and body and twist off cap. Break off tip or cut with scissors. Using the cc guide marks on the tube apply SHPSOP-1 as follows:

- 1] Streak 1 cc on top of the croup.
- 2] Streak 1 cc on the poll behind the ears; taking care to avoid the eyes and mucous membranes
- 3) Streak 1 cc behind the knee on each of the front legs (2 cc in total)
- 4] Streak 1 cc behind the hock on each of the hind legs (2 cc in total)

Place empty applicator in trash. Do not reapply for 14 days.

PROTECTS AGAINST THE VECTORS OF SWEET ITCH

Kills and repels midges, black flies and gnats, vectors that may cause Sweet Itch. Consult a veterinarian for Sweet Itch symptomology and/or etiology.

WARRANTY

Speer Products warrants that this product conforms to the chemical description on the label. Speer Products, neither makes nor authorizes any agent or representative to make, any other warranty of fitness or of merchantability, guarantee or representation, express or implied, concerning this material. Speer Products maximum liability for breach of this warranty shall not exceed the purchase price of this product. Buyer and user acknowledge and assume all risks and liabilities resulting from the handling, storage and use of this material which extend beyond the use of the product under normal conditions in accord with statements made on this label.

Printed on tubes

SPHSOP-1 Keep out of reach of children Caution EPA Reg. 68688-56 6 cc

