

72007-1

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



OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

March 5, 2007

R-34 S-799960
1165

UDAP Industries, Inc.
13160 Yonder Road
Bozeman, MT 59718

Attention: Ms. Tim Lynch

- Subject** UDAP Pepper Power Bear Deterrent
EPA Reg. No. 72007-1
Your amended application of September 25, 2006
- Purpose** This submission adds an additional size of can (13.6 oz or 380 g) for this product, in addition to the can sizes that we have already approved for this product, under sec 3 of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA).
- Review** We have reviewed the spray pattern data (MRID No. 469516-01) associated with this amendment and found them to be acceptable, with the following comments:
1. The spray duration results reported for the 13.6 oz (380g) container are consistent with a claim of "approximately 7 seconds". That is the longest spray duration claim that should be considered based upon the data submitted.
 2. The effective spray distance for the 380g container are consistent with a claim of 35 feet, but these data only apply to this container. For the 225g and 260g containers, the claim of effective spray distance must remain at 30 feet.

Labeling The labeling submitted with the above letter is acceptable, provided that you submit one (1) copy of final printed labeling to us, with the following change, before you ship the product.

- 1. Modify the sentence explaining the expected range of the product as follows:

This product has a range of up to 30 feet [225g, 260g size].
 This product has a range of up to 35 feet [380g size].

The appropriate sentence would appear on the appropriate size of can.

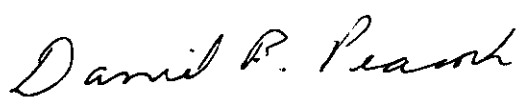
- 2. Change "7.34 seconds" to "7 seconds".
- 3. On Appendix B, add the new container weight and make the same changes above.

Existing stocks Forms Stocks of product with existing labels may be used for eighteen (18) months.

Consequence for non-compliance If this condition is not complied with, the registration 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 (phone); 703-305-6596 (fax); or peacock.dan@epa.gov (E-Mail).

Sincerely,



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

Attachment Stamped Label

File Location Dan Peacock, Flash Drive, 1gb, K:\Capsaicin\72007\72007-1, add can size, 2-27-2007.doc

Appendix A
Copy Of Proposed Label

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS & DOMESTIC ANIMALS

DANGER: May cause irreversible physical eye damage if sprayed in the eye. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Avoid contact with skin or clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

FIRST AID

Have label with you when obtaining 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, doctor, or 1-800-858-7378 immediately for 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 continue rinsing eye. Call a poison control center, doctor, or 1-800-858-7378 immediately for treatment advice.

ENVIRONMENTAL HAZARDS

Do not apply directly to water. Do not contaminate water by disposing of unused material.

PHYSICAL OR CHEMICAL HAZARDS

Contents under pressure. Do not use or store near heat or open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

STORAGE & DISPOSAL

STORAGE: STORE IN A COOL, DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F or below 32°F. Do not store in hot vehicle or a hot building.

Spills: Call 1-800-535-5053 for CHEMICAL EMERGENCY.

DISPOSAL: DO NOT INCINERATE OR PUNCTURE

Properly. Do not reuse empty container. Place in trash or offer for recycling if available. If partially filled, call your local solid waste agency for disposal instructions.

Disclaimer: To the extent allowed by law, UDAP Industries, Inc. shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product. Contact local law enforcement officials about regulations concerning this product. **Note:** As part of an ongoing research project, UDAP Industries needs your true account of UDAP Pepper Power™ use against bear attacks. Please call 1-800-232-7941 for details.



bear deterrent
BE PREPARED!

DO NOT SEEK OUT ENCOUNTERS WITH BEARS. THIS PRODUCT IS A BEAR ATTACK DETERRENT WHICH MAY PROTECT USERS IN SOME UNEXPECTED CONFRONTATIONS WITH BEARS BUT MAY NOT BE EFFECTIVE IN ALL SITUATIONS OR PREVENT ALL INJURIES. READ CAREFULLY THE ENTIRE LABEL UPON PURCHASE & BEFORE TAKING THIS PRODUCT INTO AREAS WHERE BEARS MIGHT BE ENCOUNTERED. **KEEP OUT OF REACH OF CHILDREN**

DANGER

Strong irritant to eyes, nose and skin. Wash thoroughly with soap and water after handling. See Side Panel for additional precautions.

Active Ingredients:	
Capsaicin and related capsaicinoids*	2.0%
Inert Ingredients	98.0%
TOTAL	100.0%

*Made from Oleoresin of Capsicum



Produced by a grizzly attack survivor!
CHEMICAL EMERGENCY: 1-800-535-5053

EPA Reg. No. 72007-1 EPA Est. No. 72007-MT-001

Net Contents: 13.4 ounces (380g)

DIRECTIONS FOR USE

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

USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to attack humans.

Do not seek out encounters with bears or intentionally provoke them. This product may not be effective in all situations or prevent all injuries. Do not spray this product on tents, other objects, or on clothing. Such use has no deterrent effect on bears. Keep safety clip in place except when practicing with or using the product. Do not eat or allow to be eaten any food or feed materials which may have become contaminated with this product. Use with caution. Contents will cause pain and temporary impairment to eyes, nose, mouth and lungs. Individuals who suffer from asthma or emphysema may have a more severe reaction.

This product has a range of up to 35 feet (11 meters).

This canister empties completely in approximately 4 seconds [225g container], 5.4 seconds [260g container], and 7.26 seconds [380g container].

APPLICATION DIRECTIONS: Special procedures must be followed to arm the container, apply the product, and restore the safety clip to disarm the container. Before taking this product into bear country, read the directions and familiarize yourself with these procedures. If you test-fire this container, do so with your back to the wind in an area away from people and bears. Do not test-fire Pepper Power™ in an area where you plan to camp, hunt, hike, or fish. Do not test-fire for more than a half a second. After test-firing, clean nozzle and can with soap and water to remove residue. If you have not used this product before, you should obtain a UDAP training can and practice with it until you can perform, quickly and accurately, the activities described in the column below.

TO ARM AND APPLY: Place forefinger through loop in handle with thumb on cut of safety clip (Fig. 1). With thumb, pull safety clip up and straight back. This will expose the trigger lever. Depress trigger lever with thumb, releasing a 1 second burst of spray (Fig. 2). This should be done as the attacking bear is charging toward you and is about 40 feet away (2-3 seconds from reaching you). Be aware that wind or rain can greatly affect the accuracy of the initial burst of spray. In some cases, you may have to wait until the bear is quite close before spraying. If the bear makes it through the initial burst of spray, continue spraying, aiming at the face. Shield your eyes and face if you must fire in the wind.



TO DISARM: Replace safety clip as illustrated (Fig. 3).

ACCEPTED FOR COMMENTS in EPA Letter Dated

MAR 5 2007

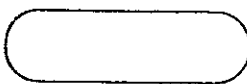
Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, the pesticide registered under EPA Reg. No.

72007-1

3/5



pepper.
power.



Holster Included



**Bear
Pepper
Spray**

**Appendix B
Page 1**

Front

**Works on
All Bear
Species**



To Deter Bears from Aggressive Attacks!

BE PREPARED!



30 FOOT FOG!
(9 meters)

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BEAR IN MIND

DEODER
power



High-emission, fire-extinguisher style spray Pattern



**Do NOT store in Hot vehicle or in direct sunlight
Read Carefully the entire label upon purchase**

**Appendix B
Page 2
Backside**

To prevent loss, the safety clip is attached to the handle, please leave attached

**To Deter Bears
from Attacking
Humans**

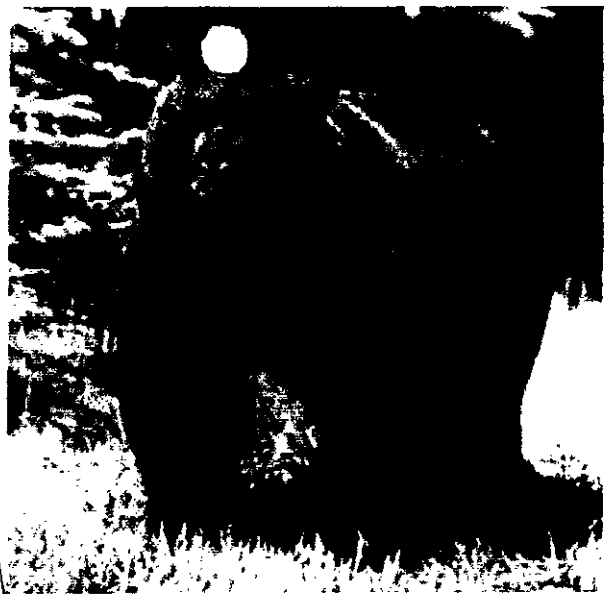


Be Prepared in Bear Country

6/9



pepper power™



Bear
Pepper
Spray

Appendix B
Page 3

Works on
All Bear
Species

To Deter Bears from Aggressive Attacks!

Be Prepared in Bear Country

For use on all Bear species

UDAP Bear Defense Products

ITEM#	NET CONTENTS	DESCRIPTION
#12	7.9oz-225g	Bear Spray (can only)
#12HP	7.9oz-225g	Bear Spray w/Hip Holster
#12CP	7.9 oz-225g	Bear Spray w/Chest Holster
#15	9.2 oz-260g	Bear Spray (can only)
#15HP	9.2 oz-260g	Bear Spray w/Hip Holster
#15CP	9.2 oz-260g	Bear Spray w/Chest Holster

Bear Spray Accessories

- GM Geta Grip - for mounting bear spray to: bikes, ATV's, RV's, boats and security locations
- 12ASC Pro-Tech - Aerosol safety case (small aircraft)
- 15ASC Pro-Tech - Aerosol safety case (small aircraft)
- ALLBG Grizzly Grip - Clamp-on Bracket for Hiking Poles

Read Carefully the entire
label upon purchase

In any kind of attack situation you have to react under pressure. Bear Attacks can be fast, often leaving you no time to think, only time to react. We strongly recommend you take time to familiarize yourself with this products operation. Practice makes perfect sense!

Thank you for purchasing this product.

800 BEAR 941
(2327)

Stay alert

Be Prepared!

UDAP's "Shoot from the Holster" designs!



Mark Matheny a grizzly bear attack survivor

Bear Attack

Mark Matheny was attacked by a female grizzly bear on a main trail. In less than half a minute the grizzly charged and mauled Mark twice. Mark's partner, Dr. Fred Bahson, reacted immediately to Mark's condition and treated his wounds. Fortunately Dr. Bahson got Mark out of the woods and to the emergency room without further incident. Mark suffered extensive bite lacerations to the head and neck, bite lacerations to the right arm, and also to the left anterior chest. This bear attack is what motivated Mark to establish UDAP Industries, Inc.

Be Prepared in Bear Country



For a limited time, the safety wedge will glow in the dark. To prevent loss, the safety wedge is attached to the handle, please leave attached.



30 FOOT FOG!
(9 grams)

DIRECTIONS FOR USE

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

USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to attack humans. Do not seek out encounters with bears or intentionally provoke them. This product may not be effective in all situations or prevent all injuries. Do not spray this product on tents, other objects, or on clothing. Such use has no deterrent effect on bears. Keep safety clip in place except when practicing with or using the product. Do not eat or allow to be eaten any food or feed materials which may have become contaminated with this product. Use with caution. Contents will cause pain and temporary impairment to eyes, nose, mouth and lungs. Individuals who suffer from asthma or emphysema may have a more severe reaction.

This product has a range of up to 30 feet (9 meters).

This container empties completely in approximately 4 seconds (225g container) 5.4 seconds (300g container).

APPLICATION DIRECTIONS: Special precautions must be followed to arm the container, apply the product, and restore the safety clip to disarm the container. Before taking this product into bear country, read the Directions and familiarize yourself with these procedures. If you use fire this container, do so with your back to the wind in an area away from people and bears. Do not use the Pepper Power™ in an area where you plan to camp, hunt, hike, or fish. Do not look for more than a half a second. Near venting, deep breathe and run with soap and water to remove residue. If you have not used this product before, you should obtain a UDAP training can and practice with it until you can perform, quickly and accurately, the activities described in the column below.

TO ARM AND APPLY: Place **holster thumb** loop in handle with thumb on cut of safety clip (Fig. 1). With thumb, pull safety clip up and straight back. This will expose the trigger level. **Thumb trigger** loop with thumb, releasing a 1 second burst of spray (Fig. 2). This should be done as the attacking bear is charging toward you and is about 40 feet away (2-3 seconds from reaching you). Be aware that wind or rain can greatly affect the accuracy of the initial burst of spray. In some cases, you may have to wait until the bear is quite close before spraying. If the bear makes it through the initial burst of spray, continue spraying, aiming for the face. Shield your eyes and face if you must face the wind.

TO DISARM: Replace safety clip as illustrated (Fig. 3).



UDAP'S HOLSTERS
Shoot from the Holster designs, providing silent and easy access to the trigger.

Chest holster can be converted to a hip holster.

Hip Holster Chest Holster

DIRECTIONS:

Hold chest holster upright, facing away from the body at chest level. Unbuckle bottom strap. Put left arm and head through top strap and place strap on shoulder. Wrap bottom strap around midsection and reattach buckle. Adjust straps to desired fit.



Appendix B
Page 4

Do NOT store in Hot vehicle or in direct sunlight
Read Carefully the entire label upon purchase

Most Bear Attacks Involve a Mother with Cub(s)

To Deter Bears from Attacking Humans

UDAP Industries
Bozeman, MT
800-BEAR 941

79354 00015 8

UDAP
#15HP
Magnum
With Holster

UDAP

Holster Included

#15HP Bear Spray w/ Holster

UDAP Industries
Bozeman, MT
800-BEAR 941

79354 00008 9

UDAP
#12HP
Bear Spray
With Holster

UDAP

pepper
holster

Holster Included

#12HP Bear Spray w/ Holster

UDAP Industries
Bozeman, MT

79354 00014 8

UDAP
#15
ITEM

UDAP

Net Contents:
9.2 oz/260g

ITEM #15

UDAP Industries
Bozeman, MT

79354 00008 2

UDAP
#12
Bear Spray

UDAP

pepper
holster

#12 225g Bear Spray

UDARP

UDARP Industries
13160 Yonder Rd.
Bozeman, MT 59718
1-800-232-7941

0 79354 10001 7


#15CP
Magnum Spray
With Chest Holster

Total wt.
15 oz.

#15CP Contents 9.2oz/260g

Magnum Bear Spray with Chest Holster

Fits Chest Sizes 32" to 54"



UDARP

UDARP Industries Inc.
13160 Yonder Rd.
Bozeman, MT 59718
1-800-232-7941

0 79354 10001 0

ITEM #12CP
225 Bear Spray
With Chest Holster

ITEM #12CP Contents 7.9oz/225g

with Chest Holster

Fits Chest Sizes 32" to 54"

