Registration Jacket 72265-1

Volume 2

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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

December 22, 2004

Security Equipment Corporation
330 Sun Valley Circle
Fenton, MO 63026

R34
17
5-772013

Attention: Mr. Robert Nance

Subject	**Frontiersman Bear Attack Deterrent** **EPA Reg. 72265-1** **Our E-Mail of December 6, 2004** **Your E-mail of December 8, 2004**
Purpose	The purpose of your submissions is to submit revised labeling for your new 7.9 oz size can and your existing 9.2 size can, as part of your amendment to increase the amount of active ingredient from 1.4% to 2.0%; to change to a more concentrated source of active ingredient; to add a smaller can size (7.9 oz); and to modify the distance and "time to empty can" claims for the product.
Labeling	The labeling for this product [can labels (7.9 oz and 9.2 oz sizes) and associated clamshell inserts], under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) is acceptable. A copy of the four labels is enclosed.
Existing stocks	Stocks of product with existing labels may be used for eighteen (18) months.
Consequence for non-compliance	If these conditions are 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 (by phone), 703-305-6596 (by fax), or peacock.dan@epa.gov (by E-Mail).

Sincerely yours,

Daniel B. Peacock

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

Enclosures Stamped Labels

Letter Dan Peacock, USB Flash Drive #1, E:\Dan's Office Work\A Flash Drive 1\Capsaicin\72265-1, revised labeling, approval, 12-13-2004.wpd

72265-1
Can Lab.
(7.9 oz size)
(p1 of 6)

PRECAUTIONARY STATEMENTS

Hazard to Humans & Domestic Animals

DANGER: May cause Irreversible eye damage if sprayed in the eyes at close range. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Strongly irritating to nose and skin. Do not get in eyes, on skin, or on 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 medical advice. Call a poison control center, doctor or 1-800-858-7378 immediately for treatment advice.
IF ON SKIN OR CLOTHING – Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes.
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.

Physical or Chemical Hazards

Flammable. Contents under pressure. Keep away from heat, sparks and open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

Environmental Hazards

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

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 many be used to deter bears that are attacking or appear likely to attack humans. This product may not be effective in all situations or prevent all injuries. Do not spray this product on objects, tents, or humans; such use has no deterrent effects on bears. Do not seek out encounters with bears or intentionally provoke them. Keep safety clip in place except when practicing with or using the product. Do not eat allow to be eaten any food or feed material that may have become contaminated with this product.

This product has an effective range of 30 feet.
The canister empties in approximately 5 seconds.

Fig. 1

Fig. 2

Fig. 3

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 below and familiarize yourself with these procedures. If you have not used this product before, you should obtain a training can and practice with it until you can perform these activities quickly and accurately. If you test fire this canister, make sure the wind is at your back and depress the actuator tab for no more than half a second. Do not test fire in areas inhabited by bears. After test firing clean nozzle and can with soap and water to remove residue from the can.

To Arm and Apply: This product is designed for one-handed operation. Place forefinger through hole in handle with thumb on safety clip curl. Pull safety clip straight back and off using thumb (Fig. 1). Depress actuator tab for burst of spray (Fig.2).
Aim at face and eyes of bear. Press trigger for 3 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.
To Disarm: Replace safety clip by firmly pushing with thumb until audible "snap" is heard (Fig. 3). Check to see if safety clip is securely in place. No gap should be visible between the actuator handle and the safety clip.

STORAGE and DISPOSAL

Storage: Store only in original container, in a dry place inaccessible to children and pets. Do not store in places where the temperature is above 120°F or below 32°F .
Disposal: Do Not Puncture or Incinerate!
If empty: Press valve to release all pressure. Then place in trash or offer for recycling if available.
If partly filled: Call your solid waste agency or 1-800-CLEANUP for disposal instructions.

FRONTIERSMAN

BEAR ATTACK DETERRENT

To Deter Bears From Attacking Humans
For Use When Hunting, Camping, Fishing, Hiking and Biking or whenever enjoying the great outdoors.

ACTIVE INGREDIENTS:
Capsaicin and related capsaicinoids*.....2.0%
INERT INGREDIENTS.....98.0%
TOTAL.....100.0%
Includes 1.1% Capsaicin and 0.9% related capsaicinoids derived from Oleoresin of *Capsicum

DO NOT SEEK OUT ENCOUNTERS WITH BEARS. THIS PRODUCT IS A BEAR ATTACK DETERRENT THAT MAY PROTECT USERS IN SOME UNEXPECTED CONFRONTATIONS WITH BEARS BUT MAY NOT BE EFFECTIVE IN ALL SITUATIONS OR PREVENT INJURIES. READ THIS ENTIRE LABEL BEFORE TAKING THIS PRODUCT INTO AREAS WHERE BEARS MIGHT BE ENCOUNTERED.

KEEP OUT OF REACH OF CHILDREN

DANGER

Strong temporary irritant to eyes, nose and skin. Wash thoroughly with soap and water after handling.

See Back Panel for Additional Precautions

EPA Reg. No. 72265-1 EPA Est. 72265-MO-1

NET CONTENTS: 7.9 OZ.

Manufactured by: Security Equipment Corporation
330 Sun Valley Circle, Fenton, MO 63026
(800) 325-9568
info@sabre-sabrered.com
Made in the U.S.A.

ACCEPTED
DEC 22 2004
Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No. 72265-1

72265-1
12-22-2004
Insert Label
(p2 of 6)
7.9 can size

FRONTIERSMAN®

BEAR ATTACK DETERRENT

FOR USE WHEN:

Camping

Hunting

Fishing

Hiking

Biking

2.0%

CAPSAICIN & RELATED CAPSAICINOIDS

FIRES UP TO

30 FEET

7.9 OZ.

Made in the USA

72265-1
12-22-2004
Insert Label
(p 3 of 6)
7.9 oz. size

FRONTIERSMAN BEAR ATTACK DETERRENT

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

DANGER: May cause irreversible eye damage if sprayed directly in the eyes at close range. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Strongly irritating to nose and skin. Do not get in eyes, on skin,or on 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. Call a poison control center, doctor, or 1-800-858-7378 immediately for treatment advice.
If On Skin or Clothing – Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes.
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.

Physical or Chemical Hazards

Flammable. Contents under *pressure. Keep away from* heat, sparks and open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

Environmental Hazards

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

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 that are attacking or appear likely to attack humans. This product may not be effective in all situations or prevent all injuries. Do not spray this product on objects, tents or humans; such use has no deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. 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 that may have become contaminated with this product.

This product has an effective range of 30 feet. The canister empties in approximately 5 seconds.

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 below and familiarize yourself with these procedures. If you have not used this product before, you should obtain a training can and practice with it until you can perform these activities quickly and accurately. If you test-fire this container, make sure the wind is at your back and depress the actuator tab for no more than half a second. Do not test-fire in areas inhabited by bears. After test firing, clean nozzle and can with soap and water to remove residue from the can.

To Arm and Apply: This product is designed for one-handed operation. Place forefinger through hole in handle with thumb on safety clip curl. Pull safety clip straight back and off using thumb (Fig. 1). Depress actuator tab for burst of spray (Fig. 2). Aim at face and eyes of bear. Press trigger for 3 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

To Disarm: Replace safety clip by firmly pushing with thumb until audible "snap" is heard (Fig. 3). Check to see if safety clip is securely in place. No gap should be visible between the actuator handle and the safety clip.

Fig. 1

Fig. 2

Fig. 3

Storage and Disposal

STORAGE: Store only in original container, in a dry place inaccessible to children and pets.

DISPOSAL: Do *Not Puncture or Incinerate*

If empty: Press valve to release all pressure. Then place in trash or offer for recycling is available.

If partly filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions.

EPA Registration No. 72265-1
EPA Est. 72265-MO-1
SECURITY EQUIPMENT CORPORATION
330 Sun Valley Circle, Fenton, MO 63026

BAR CODE

SECURITY EQUIPMENT CORPORATION
330 Sun Valley Circle • Fenton, MO 63026

PRECAUTIONARY STATEMENTS

Hazard to Humans & Domestic Animals

DANGER: May cause Irreversible eye damage if sprayed in the eyes at close range. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Strongly irritating to nose and skin. Do not get in eyes, on skin, or on clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

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Have label with you when obtaining medical advice. Call a poison control center, doctor or 1-800-858-7378 immediately for treatment advice.
IF ON SKIN OR CLOTHING – Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes.
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.

Physical or Chemical Hazards

Flammable. Contents under pressure. Keep away from heat, sparks and open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

Environmental Hazards

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

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 many be used to deter bears that are attacking or appear likely to attack humans. This product may not be effective in all situations or prevent all injuries. Do not spray this product on objects, tents, or humans; such use has no deterrent effects on bears. Do not seek out encounters with bears or intentionally provoke them. Keep safety clip in place except when practicing with or using the product. Do not eat allow to be eaten any food or feed material that mav have become contaminated with this product.

This product has an effective range of 35 feet.
The canister empties in approximately 5 seconds.

Fig. 1

Fig. 2

Fig. 3

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 below and familiarize yourself with these procedures. If you have not used this product before, you should obtain a training can and practice with it until you can perform these activities quickly and accurately. If you test fire this canister, make sure the wind is at your back and depress the actuator tab for no more than half a second. Do not test fire in areas inhabited by bears. After test firing clean nozzle and can with soap and water to remove residue from the can.

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Aim at face and eyes of bear. Press trigger for 3 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.
To Disarm: Replace safety clip by firmly pushing with thumb until audible "snap" is heard (Fig. 3). Check to see if safety clip is securely in place. No gap should be visible between the actuator handle and the safety clip.

STORAGE and DISPOSAL

Storage: *Store only in original container, in a dry place inaccessible to* children and pets. Do not store in places where the temperature is above 120°F or below 32°F .
Disposal: Do Not Puncture or Incinerate!
If empty: Press valve to release all pressure. Then place in trash or offer for recycling if available.
If partly filled: Call your solid waste agency or 1-800-CLEANUP for disposal instructions.

12-22-2004 72265-1
Can Label
9.2 oz size (p4 of 6)

FRONTIERSMAN

BEAR ATTACK DETERRENT

To Deter Bears From Attacking Humans
For Use When Hunting, Camping, Fishing, Hiking and Biking or whenever enjoying the great outdoors.

ACTIVE INGREDIENTS:
Capsaicin and related capsaicinoids*.....2.0%
INERT INGREDIENTS.....98.0%
TOTAL.....100.0%
Includes 1.1% Capsaicin and 0.9% related capsaicinoids derived from Oleoresin of *Capsicum

DO NOT SEEK OUT ENCOUNTERS WITH BEARS. THIS PRODUCT IS A BEAR ATTACK DETERRENT THAT MAY PROTECT USERS IN SOME UNEXPECTED CONFRONTATIONS WITH BEARS BUT MAY NOT BE EFFECTIVE IN ALL SITUATIONS OR PREVENT INJURIES. READ THIS ENTIRE LABEL BEFORE TAKING THIS PRODUCT INTO AREAS WHERE BEARS MIGHT BE ENCOUNTERED.

KEEP OUT OF REACH OF CHILDREN

DANGER

Strong temporary irritant to eyes, nose and skin. Wash thoroughly with soap and water after handling.

See Back Panel for Additional Precautions

EPA Reg. No. 72265-1 EPA Est. 72265-MO-1

NET CONTENTS: 9.2 OZ.

Manufactured by: Security Equipment Corporation
330 Sun Valley Circle, Fenton, MO 63026
(800) 325-9568
info@sabre-sabrered.com
Made in the U.S.A.

FRONTIERSMAN BEAR ATTACK DETERRENT

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

DANGER: May cause irreversible eye damage if sprayed directly in the eyes at close range. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Strongly irritating to nose and skin. Do not get in eyes, on skin,or on 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. Call a poison control center, doctor, or 1-800-858-7378 immediately for treatment advice.

722654
(2-22-2004)
(p5 of 6)
9.2oz size

FRONTIERSMAN®

BEAR ATTACK DETERRENT

FOR USE WHEN:

- Camping
- Hunting
- Fishing
- Hiking
- Biking

2.0%
CAPSAICIN & RELATED CAPSAICINOIDS

FIRES UP TO 35 FEET

9.2 OZ.

Made in the USA

72265-1
12-22-2004
Insert
(p6 of 6)
9.2 oz. can size

FRONTIERSMAN BEAR ATTACK DETERRENT

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

DANGER: May cause irreversible eye damage if sprayed directly in the eyes at close range. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Strongly irritating to nose and skin. Do not get in eyes, on skin or on 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. Call a poison control center, doctor, or 1-800-858-7378 immediately for treatment advice.
If On Skin or Clothing – Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes.
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.

Physical or Chemical Hazards

Flammable. Contents under pressure. Keep away from heat, sparks and open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

Environmental Hazards

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

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 that are attacking or appear likely to attack humans. This product may not be effective in all situations or prevent all injuries. Do not spray this product on objects, tents or humans; such use has no deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. 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 that may have become contaminated with this product.

This product has an effective range of 35 feet. The canister empties in approximately 5 seconds.

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 below and familiarize yourself with these procedures. If you have not used this product before, you should obtain a training can and practice with it until you can perform these activities quickly and accurately. If you test-fire this container, make sure the wind is at your back and depress the actuator tab for no more than half a second. Do not test-fire in areas inhabited by bears. After test firing, clean nozzle and can with soap and water to remove residue from the can.

To Arm and Apply: This product is designed for one-handed operation. Place forefinger through hole in handle with thumb on safety clip curl. Pull safety clip straight back and off using thumb (Fig. 1). Depress actuator tab for burst of spray (Fig. 2). Aim at face and eyes of bear. Press trigger for 3 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

To Disarm: Replace safety clip by firmly pushing with thumb until audible "snap" is heard (Fig. 3). Check to see if safety clip is securely in place. No gap should be visible between the actuator handle and the safety clip.

Fig. 1

Fig. 2

Fig. 3

Storage and Disposal

STORAGE: Store only in original container, in a dry place inaccessible to children and pets.

DISPOSAL: Do Not Puncture or Incinerate

If empty: Press valve to release all pressure. Then place in trash or offer for recycling is available.

If partly filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions.

EPA Registration No. 72265-1
EPA Est. 72265-MO-1
SECURITY EQUIPMENT CORPORATION
330 Sun Valley Circle, Fenton, MO 63026

BAR CODE

SECURITY EQUIPMENT CORPORATION
330 Sun Valley Circle • Fenton, MO 63026

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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

December 22, 2004

Security Equipment Corporation
330 Sun Valley Circle
Fenton, MO 63026

Attention: Mr. Robert Nance

Subject	**Frontiersman Bear Attack Deterrent** **EPA Reg. 72265-1** **Our E-Mail of December 6, 2004** **Your E-mail of December 8, 2004**
Purpose	The purpose of your submissions is to submit revised labeling for your new 7.9 oz size can and your existing 9.2 size can, as part of your amendment to increase the amount of active ingredient from 1.4% to 2.0%; to change to a more concentrated source of active ingredient; to add a smaller can size (7.9 oz); and to modify the distance and "time to empty can" claims for the product.
Labeling	The labeling for this product [can labels (7.9 oz and 9.2 oz sizes) and associated clamshell inserts], under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) is acceptable. A copy of the four labels is enclosed.
Existing stocks	Stocks of product with existing labels may be used for eighteen (18) months.
Consequence for non-compliance	If these conditions are 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 (by phone), 703-305-6596 (by fax), or peacock.dan@epa.gov (by E-Mail).

Sincerely yours,

DBP

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

Enclosures Stamped Labels

Letter Dan Peacock, USB Flash Drive #1, E:\Dan's Office Work\A Flash Drive 1\Capsaicin\72265-1, revised labeling, approval, 12-13-2004.wpd

72265-1
12-22-2004
Can Label - 7.9oz size
(p1 of 6)

FRONTIERSMAN

BEAR ATTACK DETERRENT

To Deter Bears From Attacking Humans
For Use When Hunting, Camping, Fishing, Hiking and Biking or whenever enjoying the great outdoors.

ACTIVE INGREDIENTS:

Capsaicin and related capsaicinoids*	**2.0%**
INERT INGREDIENTS	**98.0%**
TOTAL	**100.0%**

Includes 1.1% Capsaicin and 0.9% related capsaicinoids derived from Oleoresin of *Capsicum

DO NOT SEEK OUT ENCOUNTERS WITH BEARS. THIS PRODUCT IS A BEAR ATTACK DETERRENT THAT MAY PROTECT USERS IN SOME UNEXPECTED CONFRONTATIONS WITH BEARS BUT MAY NOT BE EFFECTIVE IN ALL SITUATIONS OR PREVENT INJURIES. READ THIS ENTIRE LABEL BEFORE TAKING THIS PRODUCT INTO AREAS WHERE BEARS MIGHT BE ENCOUNTERED.

KEEP OUT OF REACH OF CHILDREN

DANGER

Strong temporary irritant to eyes, nose and skin. Wash thoroughly with soap and water after handling.

See Back Panel for Additional Precautions

EPA Reg. No. 72265-1 EPA Est. 72265-MO-1

NET CONTENTS: 7.9 OZ.

Manufactured by: Security Equipment Corporation
330 Sun Valley Circle, Fenton, MO 63026
(800) 325-9568
info@sabre-sabrered.com
Made in the U.S.A.

PRECAUTIONARY STATEMENTS

Hazard to Humans & Domestic Animals

DANGER: May cause Irreversible eye damage if sprayed in the eyes at close range. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Strongly irritating to nose and skin. Do not get in eyes, on skin, or on clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

First Aid

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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.

Physical or Chemical Hazards

Flammable. Contents under pressure. Keep away from heat, sparks and open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

Environmental Hazards

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

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 many be used to deter bears that are attacking or appear likely to attack humans. This product may not be effective in all situations or prevent all injuries. Do not spray this product on objects, tents, or humans; such use has no deterrent effects on bears. Do not seek out encounters with bears or intentionally provoke them. Keep safety clip in place except when practicing with or using the product. Do not eat allow to be eaten any food or feed material that may have become contaminated with this product.

This product has an effective range of 30 feet. The canister empties in approximately 5 seconds.

Fig. 1

Fig. 2

Fig. 3

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 below and familiarize yourself with these procedures. If you have not used this product before, you should obtain a training can and practice with it until you can perform these activities quickly and accurately. If you test fire this canister, make sure the wind is at your back and depress the actuator tab for no more than half a second. Do not test fire in areas inhabited by bears. After test firing clean nozzle and can with soap and water to remove residue from the can.

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STORAGE and DISPOSAL

Storage: Store only in original container, in a dry place inaccessible to children and pets. Do not store in places where the temperature is above 120°F or below 32°F .
Disposal: Do Not Puncture or Incinerate!
If empty: Press valve to release all pressure. Then place in trash or offer for recycling if available.
If partly filled: Call your solid waste agency or 1-800-CLEANUP for disposal instructions.

ACCEPTED
DEC 22 2004
Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No. 72265-1

72265-1
12-22-2004
Insert Label
7.9 oz size
(p2 of 6)

FRONTIERSMAN®

BEAR ATTACK DETERRENT

FOR USE WHEN:

Camping

Hunting

Fishing

Hiking

Biking

2.0%

CAPSAICIN & RELATED CAPSAICINOIDS

FIRES UP TO

30 FEET

7.9 OZ.

Made in the USA

72265-1
12-22-2004
Insert
7.9 oz. size
(p 3 of 6)

FRONTIERSMAN BEAR ATTACK DETERRENT

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

DANGER: May cause irreversible eye damage if sprayed directly in the eyes at close range. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Strongly irritating to nose and skin. Do not get in eyes, on skin or on clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

First Aid

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Physical or Chemical Hazards

Flammable. Contents under pressure. Keep away from heat, sparks and open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

Environmental Hazards

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

Fig. 1

Fig. 2

Fig. 3

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 that are attacking or appear likely to attack humans. This product may not be effective in all situations or prevent all injuries. Do not spray this product on objects, tents or humans; such use has no deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. 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 that may have become contaminated with this product.

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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 below and familiarize yourself with these procedures. If you have not used this product before, you should obtain a training can and practice with it until you can perform these activities quickly and accurately. If you test-fire this container, make sure the wind is at your back and depress the actuator tab for no more than half a second. Do not test-fire in areas inhabited by bears. After test firing, clean nozzle and can with soap and water to remove residue from the can.

To Arm and Apply: This product is designed for one-handed operation. Place forefinger through hole in handle with thumb on safety clip curl. Pull safety clip straight back and off using thumb (Fig. 1). Depress actuator tab for burst of spray (Fig. 2). Aim at face and eyes of bear. Press trigger for 3 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

To Disarm: Replace safety clip by firmly pushing with thumb until audible "snap" is heard (Fig. 3). Check to see if safety clip is securely in place. No gap should be visible between the actuator handle and the safety clip.

Storage and Disposal

STORAGE: Store only in original container, in a dry place inaccessible to children and pets.

DISPOSAL: Do Not Puncture or Incinerate

If empty: Press valve to release all pressure. Then place in trash or offer for recycling is available.

If partly filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions.

EPA Registration No. 72265-1
EPA Est. 72265-MO-1
SECURITY EQUIPMENT CORPORATION
330 Sun Valley Circle, Fenton, MO 63026

BAR CODE

SECURITY EQUIPMENT CORPORATION
330 Sun Valley Circle • Fenton, MO 63026

72265-1
12-22-2004
Can Label, 9.2 oz size
(p4 of 6)

FRONTIERSMAN
BEAR ATTACK DETERRENT

To Deter Bears From Attacking Humans
For Use When Hunting, Camping, Fishing, Hiking and Biking or whenever enjoying the great outdoors.

ACTIVE INGREDIENTS:
Capsaicin and related capsaicinoids*.....2.0%
INERT INGREDIENTS.....98.0%
TOTAL.....100.0%
Includes 1.1% Capsaicin and 0.9% related capsaicinoids derived from Oleoresin of *Capsicum

DO NOT SEEK OUT ENCOUNTERS WITH BEARS. THIS PRODUCT IS A BEAR ATTACK DETERRENT THAT MAY PROTECT USERS IN SOME UNEXPECTED CONFRONTATIONS WITH BEARS BUT MAY NOT BE EFFECTIVE IN ALL SITUATIONS OR PREVENT INJURIES. READ THIS ENTIRE LABEL BEFORE TAKING THIS PRODUCT INTO AREAS WHERE BEARS MIGHT BE ENCOUNTERED.

KEEP OUT OF REACH OF CHILDREN

DANGER

Strong temporary irritant to eyes, nose and skin. Wash thoroughly with soap and water after handling.

See Back Panel for Additional Precautions

EPA Reg. No. 72265-1 EPA Est. 72265-MO-1

NET CONTENTS: 9.2 OZ.

Manufactured by: Security Equipment Corporation
330 Sun Valley Circle, Fenton, MO 63026
(800) 325-9568
info@sabre-sabrered.com
Made in the U.S.A.

PRECAUTIONARY STATEMENTS
Hazard to Humans & Domestic Animals

DANGER: May cause Irreversible eye damage if sprayed in the eyes at close range. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Strongly irritating to nose and skin. Do not get in eyes, on skin, or on 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 medical advice. Call a poison control center, doctor or 1-800-858-7378 immediately for treatment advice.
IF ON SKIN OR CLOTHING – Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes.
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.

Physical or Chemical Hazards

Flammable. Contents under pressure. Keep away from heat, sparks and open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

Environmental Hazards

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

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 many be used to deter bears that are attacking or appear likely to attack humans. This product may not be effective in all situations or prevent all injuries. Do not spray this product on objects, tents, or humans; such use has no deterrent effects on bears. Do not seek out encounters with bears or intentionally provoke them. Keep safety clip in place except when practicing with or using the product. Do not eat allow to be eaten any food or feed material that mav have become contaminated with this product.

This product has an effective range of 35 feet.
The canister empties in approximately 5 seconds.

Fig. 1

Fig. 2

Fig. 3

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 below and familiarize yourself with these procedures. If you have not used this product before, you should obtain a training can and practice with it until you can perform these activities quickly and accurately. If you test fire this canister, make sure the wind is at your back and depress the actuator tab for no more than half a second. Do not test fire in areas inhabited by bears. After test firing clean nozzle and can with soap and water to remove residue from the can.

To Arm and Apply: This product is designed for one-handed operation. Place forefinger through hole in handle with thumb on safety clip curl. Pull safety clip straight back and off using thumb (Fig. 1). Depress actuator tab for burst of spray (Fig.2).
Aim at face and eyes of bear. Press trigger for 3 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.
To Disarm: Replace safety clip by firmly pushing with thumb until audible "snap" is heard (Fig. 3). Check to see if safety clip is securely in place. No gap should be visible between the actuator handle and the safety clip.

STORAGE and DISPOSAL

Storage: Store only in original container, in a dry place inaccessible to children and pets. Do not store in places where the temperature is above 120°F or below 32°F .
Disposal: Do Not Puncture or Incinerate!
If empty: Press valve to release all pressure. Then place in trash or offer for recycling if available.
If partly filled: Call your solid waste agency or 1-800-CLEANUP for disposal instructions.

72265-1
12-22-2004
Insert Label
9.2 oz size
(p5 of 6)

FRONTIERSMAN®

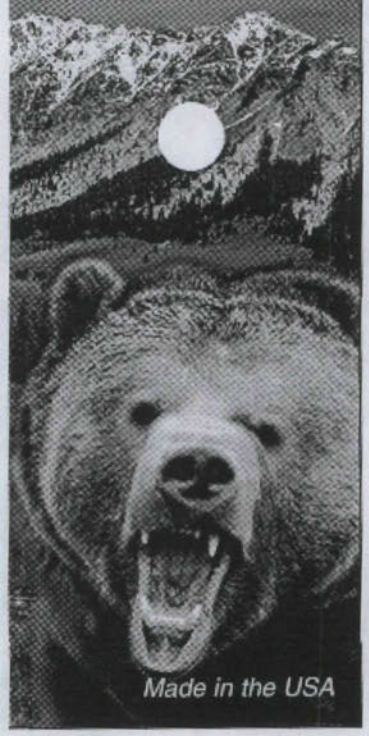
BEAR ATTACK DETERRENT

FOR USE WHEN:

- Camping
- Hunting
- Fishing
- Hiking
- Biking

2.0%
CAPSAICIN & RELATED CAPSAICINOIDS

FIRES UP TO 35 FEET



9.2 OZ.

Made in the USA

72265-1
12-22-2004
Insert
9.2 oz size
(p6 of 6)

FRONTIERSMAN BEAR ATTACK DETERRENT

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

DANGER: May cause irreversible eye damage if sprayed directly in the eyes at close range. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Strongly irritating to nose and skin. Do not get in eyes, on skin,or on 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. Call a poison control center, doctor, or 1-800-858-7378 immediately for treatment advice.
If On Skin or Clothing – Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes.
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.

Physical or Chemical Hazards

Flammable. Contents under pressure. Keep away from heat, sparks and open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

Environmental Hazards

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

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 that are attacking or appear likely to attack humans. This product may not be effective in all situations or prevent all injuries. Do not spray this product on objects, tents or humans; such use has no deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. 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 that may have become contaminated with this product.

This product has an effective range of 35 feet. The canister empties in approximately 5 seconds.

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 below and familiarize yourself with these procedures. If you have not used this product before, you should obtain a training can and practice with it until you can perform these activities quickly and accurately. If you test-fire this container, make sure the wind is at your back and depress the actuator tab for no more than half a second. Do not test-fire in areas inhabited by bears. After test firing, clean nozzle and can with soap and water to remove residue from the can.

To Arm and Apply: This product is designed for one-handed operation. Place forefinger through hole in handle with thumb on safety clip curl. Pull safety clip straight back and off using thumb (Fig. 1). Depress actuator tab for burst of spray (Fig. 2). Aim at face and eyes of bear. Press trigger for 3 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

To Disarm: Replace safety clip by firmly pushing with thumb until audible "snap" is heard (Fig. 3). Check to see if safety clip is securely in place. No gap should be visible between the actuator handle and the safety clip.

Fig. 1

Fig. 2

Fig. 3

Storage and Disposal

STORAGE: Store only in original container. In a dry place inaccessible to children and pets.

DISPOSAL: Do Not Puncture or Incinerate

If empty: Press valve to release all pressure. Then place in trash or offer for recycling is available.

If partly filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions.

EPA Registration No. 72265-1
EPA Est. 72265-MO-1
SECURITY EQUIPMENT CORPORATION
330 Sun Valley Circle, Fenton, MO 63026

BAR CODE

SECURITY EQUIPMENT CORPORATION
330 Sun Valley Circle • Fenton, MO 63026

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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

December 22, 2004

Security Equipment Corporation
330 Sun Valley Circle
Fenton, MO 63026

Attention: Mr. Robert Nance

Subject	**Frontiersman Bear Attack Deterrent** **EPA Reg. 72265-1** **Our E-Mail of December 6, 2004** **Your E-mail of December 8, 2004**
Purpose	The purpose of your submissions is to submit revised labeling for your new 7.9 oz size can and your existing 9.2 size can, as part of your amendment to increase the amount of active ingredient from 1.4% to 2.0%; to change to a more concentrated source of active ingredient; to add a smaller can size (7.9 oz); and to modify the distance and "time to empty can" claims for the product.
Labeling	The labeling for this product [can labels (7.9 oz and 9.2 oz sizes) and associated clamshell inserts], under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) is acceptable. A copy of the four labels is enclosed.
Existing stocks	Stocks of product with existing labels may be used for eighteen (18) months.
Consequence for non-compliance	If these conditions are 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 (by phone), 703-305-6596 (by fax), or peacock.dan@epa.gov (by E-Mail).

Sincerely yours,

DBP

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

Enclosures Stamped Labels

Letter Dan Peacock, USB Flash Drive #1, E:\Dan's Office Work\A Flash Drive 1\Capsaicin\72265-1, revised labeling, approval, 12-13-2004.wpd

Bob Nance <rnance@sabre-sabrered.com>
12/08/2004 04:21 PM

To Dan Peacock/DC/USEPA/US@EPA
cc
bcc
Subject Fw: Frontiersman Labels and Inserts

Dan,

Please delete the prior message. I attached a prior version of the FRONTIERSMAN labels. The latest versions are attached to this e-mail.

Thanks.

-Bob Nance

----- Original Message -----
From: "Bob Nance" <rnance@sabre-sabrered.com>
To: <Peacock.Dan@epamail.epa.gov>
Sent: Wednesday, December 08, 2004 3:08 PM
Subject: Re: Frontiersman Labels and Inserts

> Dan,
>
> This e-mail is being sent in reply to your e-mail sent on December 6th,
> 2004. I have attached the revised labels and product inserts. I believe
> that I have met all of the change requests documented in your Dec 6th
> e-mail. Please review and advise.
>
> Thanks again for your assistance.
>
> -Bob Nance
>
> ----- Original Message -----
> From: <Peacock.Dan@epamail.epa.gov>
> To: "Bob Nance" <rnance@sabre-sabrered.com>
> Sent: Monday, December 06, 2004 10:07 AM
> Subject: Re: Frontiersman Labels and Inserts
>
>
> > Bob,
> >
> >
> > Thank you for E-Mailing your proposed labeling. That saves a lot of
> > time.
> >
> > I reviewed the labeling and put my comments in the attached Word Perfect
> > and Word versions. As soon as you make the changes, I am ready to
> > stamp the labeling. If you have questions, please contact. me.

> >
> > As you will notice from my E-Mail letter, I was not certain of the
> > formatting to be used on the can label. Are you formatting headings and
> > subheading as you did in the labeling approved 7-17-2000? We like that
> > type of formatting.
> >
> > (See attached file: 72265-1, revised labeling, 12-6-2004.wpd)(See
> > attached file: 72265-1, revised labeling, 12-6-2004.doc)
> >
> > Daniel B. Peacock, Biologist
> > Insecticide-Rodenticide Branch
> > Registration Division (7504C)
> > 1200 Pennsylvania Ave. NW
> > Washington, DC 20460
> >
> > Tel: 703-305-5407
> > Fax: 703-305-6596
> > E-Mail: peacock.dan@epa.gov
> >
> >
> >
> > Bob Nance
> > <rnance@sabre-sa
> > brered.com> To
> > Dan Peacock/DC/USEPA/US@EPA
> > 12/02/2004 02:34 cc
> > PM
> > Subject
> > Frontiersman Labels and Inserts
> >
> >
> >
> >
> >
> >
> >
> >
> >
> > Dan,
> >
> > Attached are the labels and clam shell packaging inserts. I will send a
> > letter and 3 copies of each in the mail. Please let me know if you have

> > any questions.
> >
> > Thanks.
> >
> >
> > Robert Nance
> > V.P. of Operations
> > Security Equipment Corporation
> > 330 Sun Valley Circle
> > Fenton, MO 63026
> > 800-325-9568 (phone)
> > 636-343-0200
> > 636-343-1318 (fax)
> > www.sabre-sabrered.com
> > rnance@sabre-sabrered.com[attachment "9.2 oz Label - Version 2.0.pdf"
> > deleted by Dan Peacock/DC/USEPA/US] [attachment "7.9 oz Label - Version
> > 2.0.pdf" deleted by Dan Peacock/DC/USEPA/US] [attachment
> > "frontiersman_v22_epa.pdf" deleted by Dan Peacock/DC/USEPA/US]
>

frontiersman insert v2.0.pdf 9.2 oz Label - Final 3.1.pdf 7.9 oz Label - Final 3.1.pdf

SECURITY
EQUIPMENT CORPORATION

Submission superceded by 12/8/2004 E-Mail

December 3, 2004

72265-1

Dan Peacock
Environmental Protection Agency
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

RE: EPA letter dated November 18, 2004

Mr. Peacock:

As required by your letter dated November 18, 2004, I have included three (3) copies of both the 7.9 oz and 9.2 oz Frontiersman Bear Attack Deterrent label as well as the clam shell insert for the units. We are using one insert. It is the same for both models. I have made the required changes to each. Please contact me at 800-325-9568 when the labels have been approved. I would like to have these products available for sale in January, 2005. Please let me know if this is not possible.

Thank you for your help in getting this application approved.

Sincerely,

Robert Nance
V. P. of Operations

Enclosure
- 7.9 oz Frontiersman Bear Deterrent label (3)
- 9.2 oz Frontiersman Bear Deterrent label (3)
- FRONTIERSMAN Bear Attack Deterrent Insert (3)

330 Sun Valley Circle
Fenton, MO 63026

(636) 343-0200
(800) 325-9568
(636) 343-1318 Fax

E-Mail: info@sabre-sabrered.com
http://www.sabre-sabrered.com

PRECAUTIONARY STATEMENTS

Hazard to Humans & Domestic Animals

DANGER: May cause Irreversible eye damage if sprayed in the eyes at close range Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Strongly irritating to nose and skin. Do not get in eyes, on skin, or on 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 medical advice. Call a poison control center, doctor or 1-800-858-7378 immediately for treatment advice.

IF ON SKIN OR CLOTHING – Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes.

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.

Physical or Chemical Hazards

Flammable. Contents under pressure. Keep away from heat, sparks and open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

Environmental Hazards

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

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 many be used to deter bears that are attacking or appear likely to attack humans. This product may not be effective in all situations or prevent all injuries. Do not spray this product on objects, tents, or humans; such use has no deterrent effects on bears. Do not seek out encounters with bears or intentionally provoke them. Keep safety clip in place except when practicing with or using the product. Do not eat allow to be eaten any food or feed material that may have become contaminated with this product.

This product has an effective range of 35 feet. The canister empties in approximately 5 seconds.

Fig. 1

Fig. 2

Fig. 3

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 below and familiarize yourself with these procedures. If you have not used this product before, you should obtain a training can and practice with it until you can perform these activities quickly and accurately. If you test fire this canister, make sure the wind is at your back and depress the actuator tab for no more than half a second. Do not test fire in areas inhabited by bears. After test firing clean nozzle and can with soap and water to remove residue from the can.

To Arm and Apply: This product is designed for one-handed operation. Place forefinger through hole in handle with thumb on safety clip curl. Pull safety clip straight back and off using thumb (Fig. 1). Depres actuator tab for burst of spray (Fig.2).

Aim at face and eyes of bear. Press trigger for 3 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

To Disarm: Replace safety clip by firmly pushing with thumb until audible "snap" is heard (Fig. 3). Check to see if safety clip is securely in place. No gap should be visible between the actuator handle and the safety clip.

STORAGE and DISPOSAL

Storage: Store in a cool, dry place inaccessible to children and pets. Do not store in places where the temperature may exceed 120°F. Disposal: When container is empty, press valve to release all pressure. Replace safety clip, wrap container and discard in trash. Do not incinerate or puncture.

FRONTIERSMAN

BEAR ATTACK DETERRENT

To Deter Bears From Attacking Humans
For Use When Hunting, Camping, Fishing, Hiking and Biking or whenever enjoying the great outdoors.

ACTIVE INGREDIENTS:

Capsaicin and related capsaicinoids*.....2.0%

INERT INGREDIENTS.....98.0%

TOTAL.....100.0%

*Includes 1.14% Capsaicinoids and 0.86% other Capsaicinoids derived from Oleoresin of Capsicum

DO NOT SEEK OUT ENCOUNTERS WITH BEARS. THIS PRODUCT IS A BEAR ATTACK REPELLENT THAT MAY PROTECT USERS IN SOME UNEXPECTED CONFRONTATIONS WITH BEARS BUT MAY NOT BE EFFECTIVE IN ALL SITUATIONS OR PREVENT INJURIES. READ THIS ENTIRE LABEL BEFORE TAKING THIS PRODUCT INTO AREAS WHERE BEARS MIGHT BE ENCOUNTERED.

KEEP OUT OF REACH OF CHILDREN

DANGER

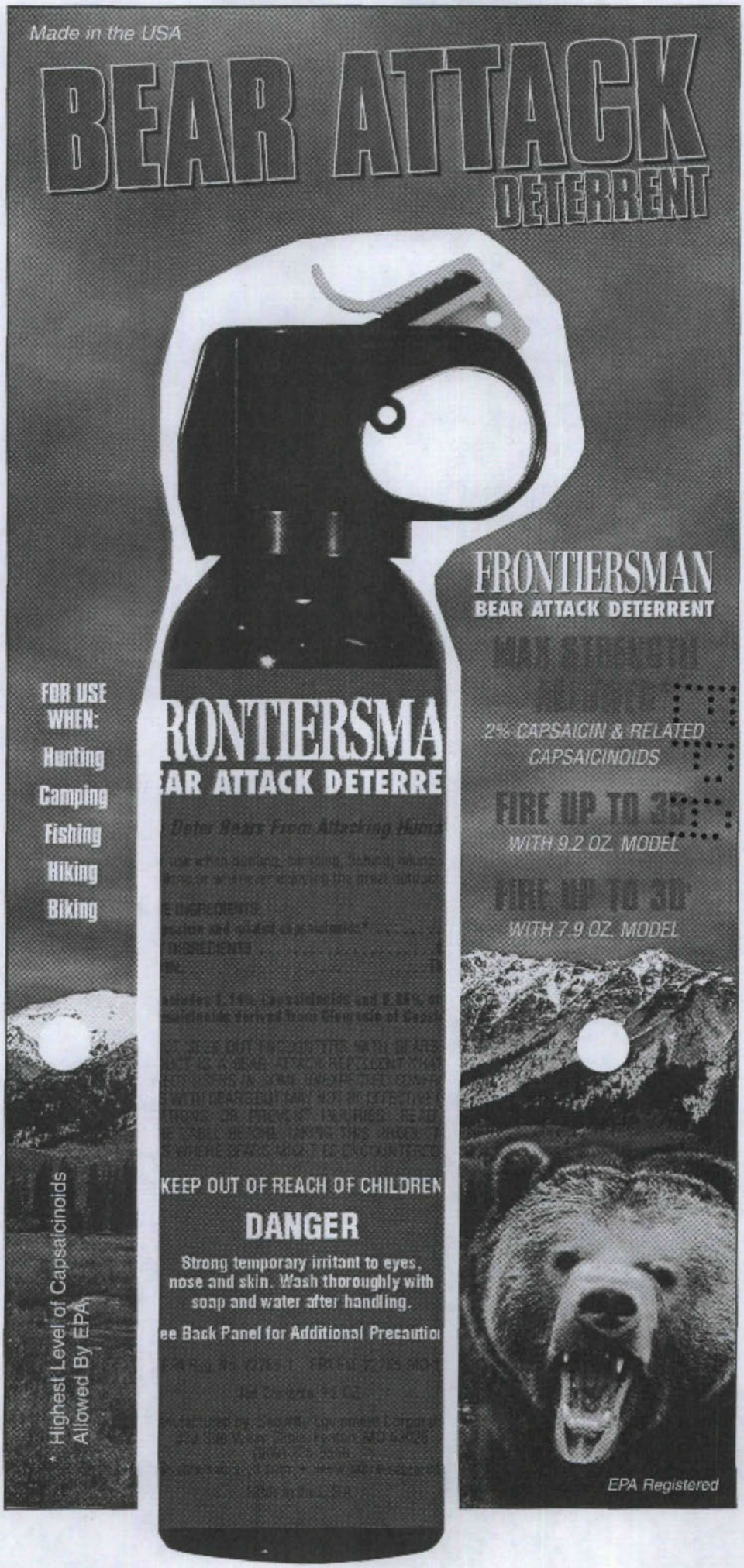
Strong temporary irritant to eyes, nose and skin.
Wash thoroughly with soap and water after handling.

See Back Panel for Additional Precautions

EPA Reg. No. 72265-1 EPA Est. 72265-MO-1

NET CONTENTS: 9.2 OZ.

Manufactured by: Security Equipment Corporation
330 Sun Valley Circle, Fenton, MO 63026
(800) 325-9568
info@sabre-sabrered.com • www.sabre-sabrered.com
Made in the U.S.A.


Made in the USA
BEAR ATTACK
DETERRENT
FRONTIERSMAN
BEAR ATTACK DETERRENT
2% CAPSAICIN & RELATED CAPSAICINOIDS
WITH 9.2 OZ. MODEL
WITH 7.9 OZ. MODEL
FOR USE WHEN:
Hunting
Camping
Fishing
Hiking
Biking
RONTIERSMA
AR ATTACK DETERRE
KEEP OUT OF REACH OF CHILDREN
DANGER
Strong temporary irritant to eyes, nose and skin. Wash thoroughly with soap and water after handling.
ee Back Panel for Additional Precautio
* Highest Level of Capsaicinoids Allowed By EPA
EPA Registered

BEAR ATTACK DETERRENT

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

DANGER: May cause irreversible eye damage if sprayed directly in the eyes at close range. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Strongly irritating to nose and skin. Do not get in eyes, on skin,or on 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. Call a poison control center, doctor, or 1-800-858-7378 immediately for treatment advice.
If On Skin or Clothing – Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes.
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.

Physical or Chemical Hazards

Flammable. Contents under pressure. Keep away from heat, sparks and open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

Environmental Hazards

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

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 that are attacking or appear likely to attack humans. This product may not be effective in all situations or prevent all injuries. Do not spray this product on objects, tents or humans; such use has no deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. 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 that may have become contaminated with this product.

9.2 oz. canister has an effective range of 35 feet. The canister empties in approximately 5 seconds. 7.9 oz. canister has an effective range of 30 feet. The canister empties in approximately 5 seconds.

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 below and familiarize yourself with these procedures. If you have not used this product before, you should obtain a training can and practice with it until you can perform these activities quickly and accurately. If you test-fire this container, make sure the wind is at your back and depress the actuator tab for no more than half a second. Do not test-fire in areas inhabited by bears. After test firing, clean nozzle and can with soap and water to remove residue from the can.

To Arm and Apply: This product is designed for one-handed operation. Place forefinger through hole in handle with thumb on safety clip curl. Pull safety clip straight back and off using thumb (Fig. 1). Depress actuator tab for burst of spray (Fig. 2). Aim at face and eyes of bear. Press trigger for 3 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

To Disarm: Replace safety clip by firmly pushing with thumb until audible "snap" is heard (Fig. 3). Check to see if safety clip is securely in place. No gap should be visible between the actuator handle and the safety clip.

Storage and Disposal

Storage: *Store in a cool, dry place inaccessible* to children and pets. Do not store in places where the temperature may exceed 120°F.
Disposal: When container is empty, press valve to release all pressure. Replace safety clip, wrap container and discard in trash. Do not incinerate or puncture.

EPA Reg. No. 72265-1
EPA Est. 72265-MO-1
SECURITY EQUIPMENT CORPORATION
330 Sun Valley Circle, Fenton, MO 63026

Fig. 1

Fig. 2

Fig. 3

BAR CODE

SECURITY EQUIPMENT CORPORATION
330 Sun Valley Circle • Fenton, MO 63026

Dan Peacock/DC/USEPA/US
12/06/2004 12:34 PM

To Bob Nance <rnance@sabre-sabrered.com>
cc
bcc
Subject Re: Frontiersman Labels and Inserts

Bob,

Thank you for your quick reply. Your questions were excellent ones!

The answers to your questions are as follows:

1. **Change** "REPELLENT" to "DETERRENT".

2. **Retain** the text, "Do not store in places where the temperature may exceed 120 Deg F."

Daniel B. Peacock, Biologist
Insecticide-Rodenticide Branch
Registration Division (7504C)
1200 Pennsylvania Ave. NW
Washington, DC 20460

Tel: 703-305-5407
Fax: 703-305-6596
E-Mail: peacock.dan@epa.gov
Bob Nance <rnance@sabre-sabrered.com>

Bob Nance
<rnance@sabre-sabrered.com>
12/06/2004 12:11 PM

To Dan Peacock/DC/USEPA/US@EPA
cc
Subject Re: Frontiersman Labels and Inserts

Dan,

Thanks for your reply. I have a couple of quotestions.

1.) On the front (right) panel of the label, the section just below the active ingredients has a statement that reads "THIS PRODUCT IS A BEAR ATTACK REPELLENT...". Should that be changed to "THIS PRODUCT IS A BEAR ATTACK DETERRENT..."?

2.) Under Storage and Disposal, should I remove the text "Do not store in places where the temperature may exceed 120°F."?

3.) I will format the labels exactly as the label approved 7-17-2000 and resubmit them in the next day or so.

Thanks.

-Bob Nance

----- Original Message -----
From: <Peacock.Dan@epamail.epa.gov>
To: "Bob Nance" <rnance@sabre-sabrered.com>
Sent: Monday, December 06, 2004 10:07 AM
Subject: Re: Frontiersman Labels and Inserts

> Bob,
>
>
> Thank you for E-Mailing your proposed labeling. That saves a lot of
> time.
>
> I reviewed the labeling and put my comments in the attached Word Perfect
> and Word versions. As soon as you make the changes, I am ready to
> stamp the labeling. If you have questions, please contact. me.
>
> As you will notice from my E-Mail letter, I was not certain of the
> formatting to be used on the can label. Are you formatting headings and
> subheading as you did in the labeling approved 7-17-2000? We like that
> type of formatting.
>
> (See attached file: 72265-1, revised labeling, 12-6-2004.wpd)(See
> attached file: 72265-1, revised labeling, 12-6-2004.doc)
>
> Daniel B. Peacock, Biologist
> Insecticide-Rodenticide Branch
> Registration Division (7504C)
> 1200 Pennsylvania Ave. NW
> Washington, DC 20460
>
> Tel: 703-305-5407
> Fax: 703-305-6596
> E-Mail: peacock.dan@epa.gov
>
>
>
> Bob Nance
> <rnance@sabre-sa
> brered.com> To
> Dan Peacock/DC/USEPA/US@EPA
> 12/02/2004 02:34 cc

> PM
>
> Subject
> Frontiersman Labels and Inserts
>
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>
>
> Dan,
>
> Attached are the labels and clam shell packaging inserts. I will send a
> letter and 3 copies of each in the mail. Please let me know if you have
> any questions.
>
> Thanks.
>
>
> Robert Nance
> V.P. of Operations
> Security Equipment Corporation
> 330 Sun Valley Circle
> Fenton, MO 63026
> 800-325-9568 (phone)
> 636-343-0200
> 636-343-1318 (fax)
> www.sabre-sabrered.com
> rnance@sabre-sabrered.com[attachment "9.2 oz Label - Version 2.0.pdf"
> deleted by Dan Peacock/DC/USEPA/US] [attachment "7.9 oz Label - Version
> 2.0.pdf" deleted by Dan Peacock/DC/USEPA/US] [attachment
> "frontiersman_v22_epa.pdf" deleted by Dan Peacock/DC/USEPA/US]

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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

December 6, 2004 E-Mail

Security Equipment Corporation
330 Sun Valley Circle
Fenton, MO 63026

R34 5-77145
12

Attention: Mr. Robert Nance

Subject **Frontiersman Bear Attack Deterrent**
EPA Reg. 72265-1
Your letter of November 22, 2004
Your e-mails of November 29 and December 2, 2004

Purpose The purpose of your submissions is to submit revised labeling for your new 7.9 oz size can and your existing 9.2 size can, as part of your amendment to increase the amount of active ingredient from 1.4% to 2.0%; to change to a more concentrated source of active ingredient; to add a smaller can size (7.9 oz); and to modify the distance and "time to empty can" claims for the product.

Labeling The labeling for this product [can labels (7.9 oz and 9.2 oz sizes) and clamshell insert], under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) is acceptable, provided you submit one (1) copy of final printed labeling to us, with the following changes, before you ship your product.

A. <u>Can Label (7.9 oz and 9.2 oz)</u>

✓ 1. Revise the text at the bottom of the Ingredient Statement as follows:

*Includes 1.1% Capsaicin and 0.9% related capsaicinoids derived from Oleoresin of *Capsicum*

✓ 2. At the bottom of the Front Panel, delete the web address (www.sabre-sabrered.com) as we have not reviewed the material for this product on that site and have no way to controlling future versions of information on it. We have not allowed web addresses on other bear attack products. However, you may retain the E-Mail address (info@sabre-sabrered.com).

Labeling-continued

3. Revise the "Disposal" section of your "**STORAGE AND DISPOSAL**" section to conform to PR Notice 2001-6:

STORAGE AND DISPOSAL

STORAGE: Store only in original container, in a dry place inaccessible to children and pets.

DISPOSAL:

Do Not Puncture or Incinerate!

If empty: Press valve to release all pressure. Then place in trash or offer for recycling is available.

If partly filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions.

4. Insure that there is a proper distinction between headings and subheadings on your final printed labels. The formatting on your last accepted labeling of July 17, 2000 was acceptable.

B. <u>Clamshell Labeling</u>

1. You must have separate inserts for the 7.9 oz. size can and the 9.2 oz. size can. For the insert submitted, delete "FIRE UP TO 30' WITH 7.9 OZ. MODEL". Submit a separate insert for the 7.9 oz. can.

2. Under the "**USE RESTRICTIONS**" of the insert for the 7.9 oz can, the following range and duration claim must be used:

   This product has an effective range of 30 feet.
   The canister empties in approximately 5 seconds.

3. Under the "**USE RESTRICTIONS**" of the insert for the 9.2 oz can, the following range and duration claim must be used:

   This product has an effective range of 35 feet.
   The canister empties in approximately 5 seconds.

4. To avoid confusion, place the **complete** product name at the top of the label: "Frontiersman Bear Attack Deterrent".

5. Delete "Max Strength Allowed*' and "*Highest Level of Capsaicinoids Allowed By EPA", as we consider these misleading statements about the product's effectiveness and prohibited by 40 CFR 156.10(a)(5)(ii).

Labeling-continued

6. Delete "EPA Registered" as we consider any text other than the required text under 40 CFR 156.10(a)(6)(e) to be an implied government endorsement and prohibited by 40 CFR 156.10(a)(5)(v). You may change ""Reg. No." to "Registration No."

Revisions

Send revised labeling (7.9 oz. can label, 7.9 oz insert label, 9.2 oz. can label, and 9.2 oz. insert label) by mail or E-Mail with the requested changes for our review.

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

Dan Peacock, USB Flash Drive #1, E:\Dan's Office Work\A Flash Drive 1\Capsaicin\72265-1, revised labeling, 12-6-2004.wpd

Dan Peacock/DC/USEPA/US
12/06/2004 11:07 AM

To Bob Nance <rnance@sabre-sabrered.com>
cc
bcc
Subject Re: Frontiersman Labels and Inserts

Bob,

Thank you for E-Mailing your proposed labeling. That saves a lot of time.

I reviewed the labeling and put my comments in the attached Word Perfect and Word versions. As soon as you make the changes, I am ready to stamp the labeling. If you have questions, please contact. me.

As you will notice from my E-Mail letter, I was not certain of the formatting to be used on the can label. Are you formatting headings and subheading as you did in the labeling approved 7-17-2000? We like that type of formatting.

72265-1, revised labeling, 12-6-2004.wpd 72265-1, revised labeling, 12-6-2004.doc

Daniel B. Peacock, Biologist
Insecticide-Rodenticide Branch
Registration Division (7504C)
1200 Pennsylvania Ave. NW
Washington, DC 20460

Tel: 703-305-5407
Fax: 703-305-6596
E-Mail: peacock.dan@epa.gov
Bob Nance <rnance@sabre-sabrered.com>

Bob Nance
<rnance@sabre-sabrered.com>
12/02/2004 02:34 PM

To Dan Peacock/DC/USEPA/US@EPA
cc
Subject Frontiersman Labels and Inserts

Dan,

Attached are the labels and clam shell packaging inserts. I will send a letter and 3 copies of each in the mail. Please let me know if you have any questions.

Thanks.

Robert Nance
V.P. of Operations
Security Equipment Corporation
330 Sun Valley Circle
Fenton, MO 63026
800-325-9568 (phone)
636-343-0200
636-343-1318 (fax)
www.sabre-sabrered.com
rnance@sabre-sabrered.com[attachment "9.2 oz Label - Version 2.0.pdf" deleted by Dan Peacock/DC/USEPA/US] [attachment "7.9 oz Label - Version 2.0.pdf" deleted by Dan Peacock/DC/USEPA/US] [attachment "frontiersman_v22_epa.pdf" deleted by Dan Peacock/DC/USEPA/US]

Do not stamp
Marked copy

PRECAUTIONARY STATEMENTS → centered (2) and in red?
Hazard to Humans & Domestic Animals
DANGER: May cause Irreversible eye damage if sprayed in the eyes at close range Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Strongly irritating to nose and skin. Do not get in eyes, on skin, or on clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

First Aid → (3) centered and in red
Have label with you when obtaining medical advice. Call a poison control center, doctor or 1-800-858-7378 immediately for treatment advice.
IF ON SKIN OR CLOTHING – Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes.
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.
Physical or Chemical Hazards → centered and in red
Flammable. Contents under pressure. Keep away from heat, sparks and open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.
Environmental Hazards
Do not apply directly to water. Do not contaminate water by disposing of unused materials.
DIRECTIONS FOR USE → centered (2) and in red?
It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

USE RESTRICTIONS: This product many be used to deter bears that are attacking or appear likely to attack humans. This product may not be effective in all situations or prevent all injuries. Do not spray this product on objects, tents, or humans; such use has no deterrent effects on bears. Do not seek out encounters with bears or intentionally provoke them. Keep safety clip in place except when practicing with or using the product. Do not eat allow to be eaten any food or feed material that may have become contaminated with this product.
highlighted in black
highlight

This product has an effective range of 30 feet.
The canister empties in approximately 5 seconds.

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 below and familiarize yourself with these procedures. If you have not used this product before, you should obtain a training can and practice with it until you can perform these activities quickly and accurately. If you test fire this canister, make sure the wind is at your back and depress the actuator tab for no more than half a second. Do not test fire in areas inhabited by bears. After test firing clean nozzle and can with soap and water to remove residue from the can. (3)

To Arm and Apply: This product is designed for one-handed operation. Place forefinger through hole in handle with thumb on safety clip curl. Pull safety clip straight back and off using thumb (Fig. 1). Depress actuator tab for burst of spray (Fig.2).
Aim at face and eyes of bear. Press trigger for 3 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.
To Disarm: Replace safety clip by firmly pushing with thumb until audible "snap" is heard (Fig. 3). Check to see if safety clip is securely in place. No gap should be visible between the actuator handle and the safety clip.
STORAGE and DISPOSAL
Storage: Store in a cool, dry place inaccessible to children and pets. Do not store in places where the temperature may exceed 120°F.
Disposal: When container is empty, press valve to release all pressure. Replace safety clip, wrap container and discard in trash. Do not incinerate or puncture.

TPR Notice 2001-5 (-2)

FRONTIERSMAN

BEAR ATTACK DETERRENT

To Deter Bears From Attacking Humans
For Use When Hunting, Camping, Fishing, Hiking and Biking or whenever enjoying the great outdoors.

ACTIVE INGREDIENTS:
Capsaicin and related capsaicinoids*.....2.0%
INERT INGREDIENTS.....98.0%
TOTAL.....100.0%
*Includes 1.14% Capsaicin and 0.86% other delete (1)
Capsaicinoids derived from Oleoresin of Capsicum

DO NOT SEEK OUT ENCOUNTERS WITH BEARS. THIS PRODUCT IS A BEAR ATTACK REPELLENT THAT MAY PROTECT USERS IN SOME UNEXPECTED CONFRONTATIONS WITH BEARS BUT MAY NOT BE EFFECTIVE IN ALL SITUATIONS OR PREVENT INJURIES. READ THIS ENTIRE LABEL BEFORE TAKING THIS PRODUCT INTO AREAS WHERE BEARS MIGHT BE ENCOUNTERED.

KEEP OUT OF REACH OF CHILDREN

DANGER

Strong temporary irritant to eyes, nose and skin.
Wash thoroughly with soap and water after handling.

See Back Panel for Additional Precautions

EPA Reg. No. 72265-1 EPA Est. 72265-MO-1

NET CONTENTS: 7.9 OZ.

Manufactured by: Security Equipment Corporation
330 Sun Valley Circle, Fenton, MO 63026
(800) 325-9568
~~info@sabre-sabrered.com • www.sabre-sabrered.com~~
Made in the U.S.A.

(3) General formatting comments

Marked copy

PRECAUTIONARY STATEMENTS
Hazard to Humans & Domestic Animals
DANGER: May cause Irreversible eye damage if sprayed in the eyes at close range Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Strongly irritating to nose and skin. Do not get in eyes, on skin, or on 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 medical advice. Call a poison control center, doctor or 1-800-858-7378 immediately for treatment advice.
IF ON SKIN OR CLOTHING – Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes.
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.
Physical or Chemical Hazards
Flammable. Contents under pressure. Keep away from heat, sparks and open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.
Environmental Hazards
Do not apply directly to water. Do not contaminate water by disposing of unused materials.
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 many be used to deter bears that are attacking or appear likely to attack humans. This product may not be effective in all situations or prevent all injuries. Do not spray this product on objects, tents, or humans; such use has no deterrent effects on bears. Do not seek out encounters with bears or intentionally provoke them. Keep safety clip in place except when practicing with or using the product. Do not eat allow to be eaten any food or feed material that may have become contaminated with this product.

This product has an effective range of 35 feet.
The canister empties in approximately 5 seconds.

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 below and familiarize yourself with these procedures. If you have not used this product before, you should obtain a training can and practice with it until you can perform these activities quickly and accurately. If you test fire this canister, make sure the wind is at your back and depress the actuator tab for no more than half a second. Do not test fire in areas inhabited by bears. After test firing clean nozzle and can with soap and water to remove residue from the can.

To Arm and Apply: This product is designed for one-handed operation. Place forefinger through hole in handle with thumb on safety clip curl. Pull safety clip straight back and off using thumb (Fig. 1). Depress actuator tab for burst of spray (Fig.2).
Aim at face and eyes of bear. Press trigger for 3 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.
To Disarm: Replace safety clip by firmly pushing with thumb until audible "snap" is heard (Fig. 3). Check to see if safety clip is securely in place. No gap should be visible between the actuator handle and the safety clip.
STORAGE and DISPOSAL
Storage: Store in a cool, dry place inaccessible to children and pets. Do not store in places where the temperature may exceed 120°F.
Disposal: When container is empty, press valve to release all pressure. Replace safety clip, wrap container and discard in trash. Do not incinerate or puncture.

FRONTIERSMAN
BEAR ATTACK DETERRENT

To Deter Bears From Attacking Humans
For Use When Hunting, Camping, Fishing, Hiking and Biking or whenever enjoying the great outdoors.

ACTIVE INGREDIENTS:
Capsaicin and related capsaicinoids*.....2.0%
INERT INGREDIENTS.....98.0%
TOTAL.....100.0%
*Includes 1.14% Capsaicin~~oids~~ and 0.86% other delete
Capsaicinoids derived from Oleoresin of Capsicum

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KEEP OUT OF REACH OF CHILDREN

DANGER

Strong temporary irritant to eyes, nose and skin.
Wash thoroughly with soap and water after handling.

See Back Panel for Additional Precautions

EPA Reg. No. 72265-1 EPA Est. 72265-MO-1

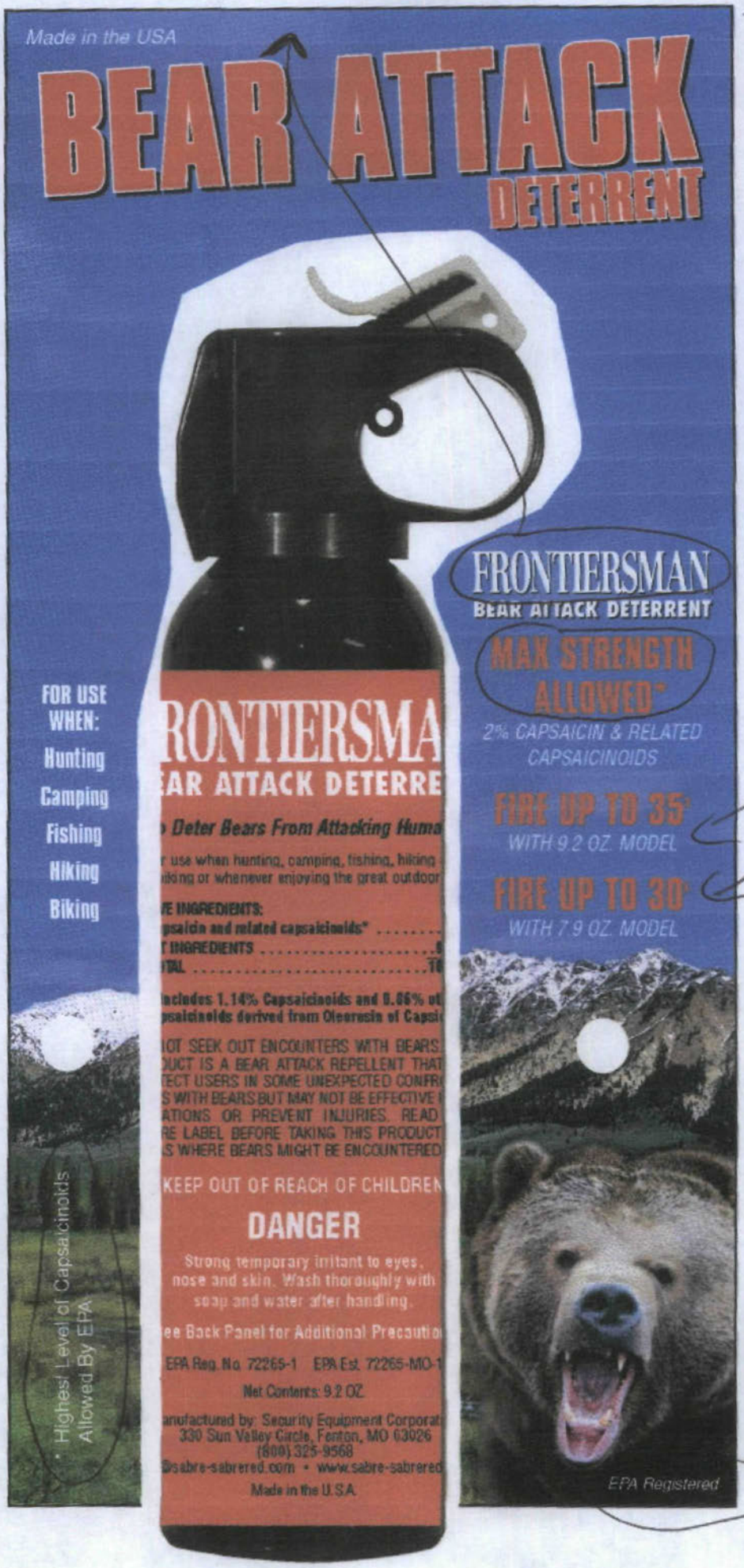
NET CONTENTS: 9.2 OZ.

Manufactured by: Security Equipment Corporation
330 Sun Valley Circle, Fenton, MO 63026
(800) 325-9568
info@sabre-sabrered.com • ~~www.sabre-sabrered.com~~
Made in the U.S.A.

Blister Back Label

Marked up

need separate Blister Pack Label for 7.9 oz and 9.2 oz size



BEAR ATTACK DETERRENT

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

DANGER: May cause irreversible eye damage if sprayed directly in the eyes at close range. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Strongly irritating to nose and skin. Do not get in eyes, on skin,or on 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. Call a poison control center, doctor, or 1-800-858-7378 immediately for treatment advice.
If On Skin or Clothing – Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes.
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.

Physical or Chemical Hazards

Flammable. Contents under pressure. Keep away from heat, sparks and open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

Environmental Hazards

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

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 that are attacking or appear likely to attack humans. This product may not be effective in all situations or prevent all injuries. Do not spray this product on objects, tents or humans; such use has no deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. 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 that may have become contaminated with this product.

9.2 oz. canister has an effective range of 35 feet. The canister empties in approximately 5 seconds. 7.9 oz. canister has an effective range of 30 feet. The canister empties in approximately 5 seconds.

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 below and familiarize yourself with these procedures. If you have not used this product before, you should obtain a training can and practice with it until you can perform these activities quickly and accurately. If you test-fire this container, make sure the wind is at your back and depress the actuator tab for no more than half a second. Do not test-fire in areas inhabited by bears. After test firing, clean nozzle and can with soap and water to remove residue from the can.

To Arm and Apply: This product is designed for one-handed operation. Place forefinger through hole in handle with thumb on safety clip curl. Pull safety clip straight back and off using thumb (Fig. 1). Depress actuator tab for burst of spray (Fig. 2). Aim at face and eyes of bear. Press trigger for 3 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

To Disarm: Replace safety clip by firmly pushing with thumb until audible "snap" is heard (Fig. 3). Check to see if safety clip is securely in place. No gap should be visible between the actuator handle and the safety clip.

Fig. 1

Fig. 2

Fig. 3

Storage and Disposal

Storage: Store in a cool, dry place inaccessible to children and pets. Do not store in places where the temperature may exceed 120°F.
Disposal: When container is empty, press valve to release all pressure. Replace safety clip, wrap container and discard in trash. Do not incinerate or puncture.

EPA Reg. No. 72265-1
EPA Est. 72265-MO-1
SECURITY EQUIPMENT CORPORATION
330 Sun Valley Circle, Fenton, MO 63026

BAR CODE

SECURITY EQUIPMENT CORPORATION
330 Sun Valley Circle • Fenton, MO 63026

Bob Nance <rnance@sabre-sabrered.com>
12/02/2004 02:34 PM

To Dan Peacock/DC/USEPA/US@EPA
cc
bcc
Subject Frontiersman Labels and Inserts

Dan,

Attached are the labels and clam shell packaging inserts. I will send a letter and 3 copies of each in the mail. Please let me know if you have any questions.

Thanks.

Robert Nance
V.P. of Operations
Security Equipment Corporation
330 Sun Valley Circle
Fenton, MO 63026
800-325-9568 (phone)
636-343-0200
636-343-1318 (fax)
www.sabre-sabrered.com

rnance@sabre-sabrered.com

9.2 oz Label - Version 2.0.pdf 7.9 oz Label - Version 2.0.pdf frontiersman_v22_epa.pdf

Frontiersman ® Bear Attack Deterrent

FRONTIERSMAN® BEAR ATTACK DETERRENT	*BEAR ATTACK DETERRENT*
Formulation:	1.4% Major Capsaicinoids (EPA - USA Sprays) 0.857% Capsaicin (Health Canada - Canada Sprays)
Propellant	134a and Nitrogen
Delivery	Heavy Fog

The Best Option for Outdoor Enthusiasts

"FIELD TESTED AND PROVEN EFFECTIVE BY THE ELMENDORF AIR FORCE BASE AND BROWN BEAR RESOURCES."

Why Carry FRONTIERSMAN Bear Attack Deterrant?

42

1). **40% Stronger** than the EPA requirement which has been proven to deter bears!
2). **Field Tested & Proven Effective** - Elmendorf Air Force Base in Alaska and Brown Bear Resources in Montana
3). **Glow-In-The-Dark Safety** - Locate canister at night or in dark areas.
4). **Safety Tie Attachment** - Prevents misplacement of Safety Mechanism.
5). **HPLC Guarantee** - Security Equipment Corporation is the only bear spray company which insures the heat level of every canister to increase effectiveness and user safety!.

"While 'pepper spray' does not guarantee safety in bear country, it is routinely proven effective in reducing injuries to bears and humans. I know of no conservation, state, federal or tribal field personnel who do not carry a defense spray when in bear country. It is the responsibility of each hiker, biker, 4-wheeler or horse rider to help protect themselves and the wildlife they observe by carrying a Frontiersman type bear attack deterrent."

Pat O'Herron
Brown Bear Resources, Inc

FBAD-01	**9.17 oz.**	***Frontiersman Bear Attack Deterrent***
FBAD-02	**9.17 oz.**	***Frontiersman Bear Attack Deterrent With Holster***
CFBAD-01	**7.9 oz.**	***Frontiersman Bear Attack Deterrent For Candada***
CFBAD-02	**7.9 oz.**	***Frontiersman Bear Attack Deterrent With Holster For Canada***

When Only The Best Will Do

Frontiersman ® Bear Attack Deterrent

EPA REG. NO. 72265-1

43

Dan Peacock/DC/USEPA/US
11/30/2004 12:28 PM

To Bob Nance <rnance@sabre-sabrered.com>
cc
bcc
Subject Re: Label changes

[This is a later reply, in which I added comments about needing to see any graphics.]

Bob,

Thank you for the E-Mail and the can labels.

Can you send me electronic copies of any other labeling accompanying this product, such as inserts, booklets, and hang tags?

Also, I need to see your graphics.

If there is no other labeling accompanying the product during sale, just indicate that fact.

I will be looking at this and any other labeling in the next few days.

Daniel B. Peacock, Biologist
Insecticide-Rodenticide Branch
Registration Division (7504C)
1200 Pennsylvania Ave. NW
Washington, DC 20460

Tel: 703-305-5407
Fax: 703-305-6596
E-Mail: peacock.dan@epa.gov
Bob Nance <rnance@sabre-sabrered.com>

Bob Nance <rnance@sabre-sabrered.com>
11/29/2004 10:18 AM

To Dan Peacock/DC/USEPA/US@EPA
cc
Subject Label changes

Bob Nance <rnance@sabre-sabrered.com>
11/29/2004 10:18 AM

To Dan Peacock/DC/USEPA/US@EPA
cc
bcc
Subject Label changes

Hello Dan,

I sent hard coppies of the label changes to you last week. Just to be certain, I have attached them to this e-mail for your review.

Thanks again.

Robert Nance
V.P. of Operations
Security Equipment Corporation
330 Sun Valley Circle
Fenton, MO 63026
800-325-9568 (phone)
636-343-0200
636-343-1318 (fax)
www.sabre-sabrered.com

rnance@sabre-sabrered.com 9.2 oz Label - Final.ppt 7.9 oz Label - Final.ppt

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www.sabre-sabrered.com
rnance@sabre-sabrered.com[attachment "9.2 oz Label - Final.ppt" deleted by Dan Peacock/DC/USEPA/US] [attachment "7.9 oz Label - Final.ppt" deleted by Dan Peacock/DC/USEPA/US]

Dan Peacock/DC/USEPA/US
11/30/2004 12:22 PM

To Bob Nance <rnance@sabre-sabrered.com>
cc
bcc
Subject Re: Label changes

Bob,

Thank you for the E-Mail and the can labels. Can you send me electronic copies of any other labeling accompanying this product, such as inserts, booklets, and hang tags? If there is no other labeling accompanying the product during sale, just indicate that fact.

I will be looking at this and any other labeling in the next few days.

Daniel B. Peacock, Biologist
Insecticide-Rodenticide Branch
Registration Division (7504C)
1200 Pennsylvania Ave. NW
Washington, DC 20460

Tel: 703-305-5407
Fax: 703-305-6596
E-Mail: peacock.dan@epa.gov
Bob Nance <rnance@sabre-sabrered.com>

Bob Nance <rnance@sabre-sabrered.com>
11/29/2004 10:18 AM

To Dan Peacock/DC/USEPA/US@EPA
cc
Subject Label changes

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Robert Nance
V.P. of Operations
Security Equipment Corporation
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www.sabre-sabrered.com
rnance@sabre-sabrered.com[attachment "9.2 oz Label - Final.ppt" deleted by Dan Peacock/DC/USEPA/US] [attachment "7.9 oz Label - Final.ppt" deleted by Dan Peacock/DC/USEPA/US]

IRD

SECURITY
EQUIPMENT CORPORATION

11·26·04

EPA

November 22, 2004

Dan Peacock
Environmental Protection Agency
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

RE: EPA letter dated November 18, 2004

Mr. Peacock:

As required by your letter dated November 18, 2004, I have included three (3) copies of both the 7.9 oz and 9.2 oz Frontiersman Bear Attack Deterrent label. I have made the required changes to each. Please contact me at 800-325-9568 when the labels have been approved. I would like to have these products available for sale in January, 2005. Please let me know if this is not possible.

Thank you for your help in getting this application approved.

Sincerely,

Robert Nance
V. P. of Operations

Enclosure
7.9 oz Frontiersman Bear Deterrent label
9.2 oz Frontiersman Bear Deterrent label
Copy of Dan Peacock's letter dated November 18, 2004

330 Sun Valley Circle
Fenton, MO 63026

(636) 343-0200
(800) 325-9568
(636) 343-1318 Fax

E-Mail: info@sabre-sabrered.com
http://www.sabre-sabrered.com

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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

November 18, 2004

R34 770636
12 761874

Security Equipment Corporation
330 Sun Valley Circle
Fenton, MO 63026

Attention: Mr. Robert Nance

Subject **Frontiersman Bear Attack Deterrent**
EPA Reg. 72265-1
Your amended application of November 17, 2003
Your submissions of November 12, 2003, and February 20, 2004

Purpose This submission, under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), requests an increase in the amount of active ingredient from 1.4% to 2.0%; a change to a more concentrated source of active ingredient; the addition of a new 7.9 oz can to your existing 9.2 oz can; a distance claim of 30 feet for the 7.9 oz can; an increase in the distance claim for the 9.2 oz can of 35 feet; and an increase in the time needed to empty the 9.2 oz can of 5.5 sec. To support these changes, you submitted product chemistry, acute toxicity, and effectiveness data.

Data **A. Chemistry Data**

We have reviewed the new data on your source and end-use product, and reviewed your revised Confidential Statements of Formula (CSF), dated August 27, 2003, for your source of active ingredient and September 15, 2004 for Frontiersman Bear Attack Deterrent, and found them acceptable.

B. Acute Toxicity Data

We have reviewed the eye irritation and skin irritation studies and found them to be acceptable. These studies require certain labeling changes listed below under "**Labeling**".

Data-continued

C. Effectiveness Data

We have reviewed the spray pattern (effectiveness) data (MRID Nos. 461406-05 and -06) and associated CD videos submitted to support the above changes to this product and reached these conclusions:

1. **7.9 oz Can**

   a. Spray Distance: 30 feet

   b. Spray Duration (meaningful evacuation time): 5 seconds

      Note: Of the 21 can evacuated, reported spray durations met or exceeded 5 seconds in 14 cases. When round to the nearest half second, the other 7 times all rounded to 5 seconds.

   c. Number of One-Second Burst: 5

2. **9.2 oz Can**

   a. Spray Distance: 35 feet

   b. Spray Duration (meaningful evacuation time): 5 seconds

      Note: Of the 23 cans evacuated, reported spray durations exceeded the proposed claim of 5.5 seconds 12 times, just over 50%. When rounded to the nearest half second, several times were below 5.5 seconds, including one rounding to 4.5 seconds. Consequently, a claim of **5 seconds** is more appropriate than 5.5 seconds for this container size.

Labeling

Within 15 days, submit three (3) copies of revised, draft labeling for both can sizes and any labeling accompanying this product, with the following changes:

1. Under "DANGER", revise the text to read:

   May cause irreversible eye damage if sprayed in the eye at close range. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Strongly irritating to nose and skin. Do not get in eyes, on skin, or on clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

Labeling-continued

2. Under the "**USE RESTRICTIONS**" of the 7.9 oz can, the following range and duration claim must be used:

   This product has an effective range of 30 feet.
   The canister empties in approximately 5 seconds.

3. Under the "**USE RESTRICTIONS**" of the 9.2 oz can, the following range and duration claim must be used:

   This product has an effective range of 35 feet.
   The canister empties in approximately 5 seconds.

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,

DBP

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

Letter location

USB Flash Drive 1, E:\Dan's Office Work\A Flash Drive 1\Capsaicin\72265-1, FFS, NFT amend, new can size, source, percentage ai, 11-17-2004.wpd

Do not stamp

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

DANGER: May cause irreversible eye damage if sprayed directly in the eyes at close range. Contact through touching or rubbing the eye may cause moderate eye irritation. Avoid contact with skin or clothing. Wash thoroughly with soap and water after handling.

First Aid

Have label with you when obtaining treatment advice. Call a poison control center, doctor, or 1-800-535-5035 immediately for treatment advice.
IF ON SKIN OR CLOTHING – Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes.
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.

Physical or Chemical Hazards

Flammable. Contents under pressure. Keep away from heat, sparks and open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

Environmental Hazards

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

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 that are attacking or appear likely to attack humans. This product may not be effective in all situations or prevent all injuries. Do not spray this product on objects, tents or humans; such use has no deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. 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 that may have become contaminated with this product.

This product has an effective range of 30 Feet.
The canister empties in approximately 8 **seconds.**

Fig. 1

Fig. 2

Fig. 3

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 below and familiarize yourself with these procedures. If you have not used this product before, you should obtain a training can and practice with it until you can perform these activities quickly and accurately. If you test-fire this container, make sure the wind is at your back and depress the actuator tab for no more than half a second. Do not test-fire in areas inhabited by bears. After test firing, clean nozzle and can with soap and water to remove residue from the can.

To Arm and Apply: This product is designed for one-handed operation. Place forefinger through hole in handle with thumb on safety clip curl. Pull safety clip straight back and off using thumb (Fig. 1). Depress actuator tab for burst of spray (Fig. 2).

Aim at face and eyes of bear. Press trigger for 3 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

To Disarm: Replace safety clip by firmly pushing with thumb until audible "snap" is heard (Fig. 3). Check to see if safety clip is securely in place. No gap should be visible between the actuator handle and the safety clip.

Storage and Disposal

Storage: Store in a cool, dry place inaccessible to children and pets. Do not store in places where the temperature may exceed 120°F. Disposal: When container is empty, press valve to release all pressure. Replace safety clip, wrap container and discard in trash. Do not incinerate or puncture.

FRONTIERSMAN

BEAR ATTACK DETERRENT

To Deter Bears From Attacking Humans

For Use When Hunting, Camping, Fishing, Hiking and Biking or whenever enjoying the great outdoors.

ACTIVE INGREDIENTS:

Capsaicin and related capsaicinoids*	2.0%
INERT INGREDIENTS	98.0%
TOTAL	100.0%

*Includes 1.14% Capsaicinoids and 0.86% other Capsaicinoids derived from Oleoresin of Capsicum

DO NOT SEEK OUT ENCOUNTERS WITH BEARS. THIS PRODUCT IS A BEAR ATTACK REPELLENT THAT MAY PROTECT USERS IN SOME UNEXPECTED CONFRONTATIONS WITH BEARS BUT MAY NOT BE EFFECTIVE IN ALL SITUATIONS OR PREVENT ALL INJURIES. READ THIS ENTIRE LABEL BEFORE TAKING THIS PRODUCT INTO AREAS WHERE BEARS MIGHT BE ENCOUNTERED.

KEEP OUT OF REACH OF CHILDREN

DANGER

Strong temporary irritant to eyes, nose and skin.
Wash thoroughly with soap and water after handling.

See Back Panel for Additional Precautions

EPA Reg. No. 72265-1 EPA Est. 72265-MO-1

NET CONTENTS: 7.3 oz

Manufactured by: Security Equipment Corporation
330 Sun Valley Circle, Fenton, MO 63026 • (800) 325-9568
info@sabre-sabrered.com • www.sabre-sabrered.com

Made in the U.S.A.

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

DANGER: May cause irreversible eye damage if sprayed directly in the eyes at close range. Contact through touching or rubbing the eye may cause moderate eye irritation. Avoid contact with skin or clothing. Wash thoroughly with soap and water after handling.

First Aid

Have label with you when obtaining treatment advice. Call a poison control center, doctor, or 1-800-535-5035 immediately for treatment advice.
IF ON SKIN OR CLOTHING – Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes.
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.

Physical or Chemical Hazards

Flammable. Contents under pressure. Keep away from heat, sparks and open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

Environmental Hazards

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

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 that are attacking or appear likely to attack humans. This product may not be effective in all situations or prevent all injuries. Do not spray this product on objects, items or humans; such use has no deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. 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 that may have become contaminated with this product.

This product has an effective range of 35 Feet.
The canister empties in approximately 6.5 Seconds.

Fig. 1

Fig. 2

Fig. 3

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 below and familiarize yourself with these procedures. If you have not used this product before, you should obtain a training can and practice with it until you can perform these activities quickly and accurately. If you test-fire this container, make sure the wind is at your back and depress the actuator tab for no more than half a second. Do not test-fire in areas inhabited by bears. After test firing, clean nozzle and can with soap and water to remove residue from the can.

To Arm and Apply: This product is designed for one-handed operation. Place forefinger through hole in handle with thumb on safety clip curl. Pull safety clip straight back and off using thumb (Fig. 1). Depress actuator tab for burst of spray (Fig. 2).

Aim at face and eyes of bear. Press trigger for 3 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

To Disarm: Replace safety clip by firmly pushing with thumb until audible "snap" is heard (Fig. 3). Check to see if safety clip is securely in place. No gap should be visible between the actuator handle and the safety clip.

Storage and Disposal

Storage: Store in a cool, dry place inaccessible to children and pets. Do not store in places where the temperature may exceed 120°F. Disposal: When container is empty, press valve to release all pressure. Replace safety clip, wrap container and discard in trash. Do not incinerate or puncture.

FRONTIERSMAN.

BEAR ATTACK DETERRENT

To Deter Bears From Attacking Humans

For Use When Hunting, Camping, Fishing, Hiking and Biking or whenever enjoying the great outdoors.

ACTIVE INGREDIENTS:

Capsaicin and related capsaicinoids*	2.0%
INERT INGREDIENTS	98.0%
TOTAL	100.0%

*Includes 1.14% Capsaicinoids and 0.86% other Capsaicinoids derived from Oleoresin of Capsicum

DO NOT SEEK OUT ENCOUNTERS WITH BEARS. THIS PRODUCT IS A BEAR ATTACK REPELLENT THAT MAY PROTECT USERS IN SOME UNEXPECTED CONFRONTATIONS WITH BEARS BUT MAY NOT BE EFFECTIVE IN ALL SITUATIONS OR PREVENT ALL INJURIES. READ THIS ENTIRE LABEL BEFORE TAKING THIS PRODUCT INTO AREAS WHERE BEARS MIGHT BE ENCOUNTERED.

KEEP OUT OF REACH OF CHILDREN

DANGER

Strong temporary irritant to eyes, nose and skin.
Wash thoroughly with soap and water after handling.

See Back Panel for Additional Precautions

EPA Reg. No. 72265-1 EPA Est. 72265-MO-1

NET CONTENTS: 9.2 OZ.

Manufactured by: Security Equipment Corporation
330 Sun Valley Circle, Fenton, MO 63026 • (800) 325-9568
info@sabre-sabrered.com • www.sabre-sabrered.com

Made in the U.S.A.

SECURITY
EQUIPMENT CORPORATION

September 15, 2004

Dan Peacock
Environmental Protection Agency
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

RE: Amendment to FRONTIERSMAN Bear Attack Deterrent 72265-1

Mr. Peacock:

I am including a revised copy of the Confidential Statement of Formulation as requested by Linda Kutney. She asked that I add the suppliers name and addresses. I have included this data for resubmission.

Please let me know if you have any questions.

Sincerely,

Robert Nance
V. P. of Operations

330 Sun Valley Circle
Fenton, MO 63026

(636) 343-0200
(800) 325-9568
(636) 343-1318 Fax

E-Mail: info@sabre-sabrered.com
http://www.sabre-sabrered.com

IRB BRANCH REVIEW - TSS

Record Number(s)

D303991

6/17/04 11/8/04

IN ____ OUT ____

EFFICACY

FILE OR REG. NO. 72256-1

PETITION OR EXP. PERMIT NO. ____

DATE DIV. RECEIVED 11/17/03

DATE OF SUBMISSION 12/2/03

DATE SUBMISSION ACCEPTED 6/17/04

TYPE PRODUCTS(S): I, D, H, F, N, R, S x

DATA ACCESSION NO(S). 461406-05; 461406-06

PRODUCT MGR. NO. 07

PRODUCT NAME(S) FRONTIERSMAN BEAR ATTACK DETERRENT

COMPANY NAME Security Equipment Corporation

SUBMISSION PURPOSE amend formulation; alter performance claims

CHEMICAL & FORMULATION 1.4% Capsaicin and related capsaicinoids aerosol

Efficacy Review: FRONTIERSMAN BEAR ATTACK DETERRENT, 72265-1
Security Equipment Corporation
Fenton, MO 63026

200.0 INTRODUCTION

200.1 Uses

A 1.4% "Capsaicin and related capsaicinoids" aerosol product Federally registered for use at unspecified sites "**only to deter bears which are attacking or appear likely to attack humans.**"

The accepted labels declare this product to be nominally 0.9% Capsaicin and 0.5% "other Capsaicinoids derived from Oleoresin of Capsicum".

200.2 Background Information

See efficacy reviews of 6/30/99, 11/9/99, 11/30/99, 1/21/00, 3/29/00, 5/31/00, 7/11/00, and 8/20/01, along with the enforcement-case efficacy reviews of 2/7/00 and 3/15/00 which pertained primarily to unregistered products produced by Security. 72265-1 was Federally registered on 7/17/00. The labels accepted on that date remain current.

This review addresses a submission of 11/17/03 which, according to the application form bearing that data, was filed

> 1.) to increase the capsaicinoids in the Frontiersman Bear Attack Deterrent from 1.4% to 2.0%, 2.) to register a new source of active ingredient, 3.) to add an additional canister size of 225 grams (7.9 ozs), and 4.) to revise the distance of the 260 gram (9.2 ozs.) canister from 18 to 25 feet, to 35 feet and the firing time from 5 seconds to 5.5 seconds by resubmitting a new shot pattern study based on the increase in propellant. This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made.

(As the "**Amendment**" box was checked on the application form, it is not clear why the last sentence, consisting of "Notification" boilerplate, was included. The proposed changes were inappropriate for the "Notification" approach as they involve product performance data and significant label and changes for a product with "public health" claims.)

The materials routed for my review include the aforementioned application form, reports of spray pattern studies for the 7.9-oz and 9.2-oz containers, 3 copies of CD video recordings of some of the spray tests, and one copy each of proposed labels for the 7.9-oz and the 9.2-oz canisters that are to hold the new formulation for 72265-1.

201.0 DATA SUMMARY

201.0 Old and New Formulations

The pending Confidential Statement of Formula (CSF) is dated 11/14/03. If accepted, that CSF would change the source of active principles from [redacted]

An effort to increase the formulation strength of this product has been afoot for more than a year. It is not likely that the proposed 2.0% total capsaicinoid concentration is necessary to deter attacking bears. What is clear is that, in the highly competitive marketing of bear pepper sprays, the existence of one registered 2.0% total capsaicinoid product on the market has created a climate in which Security Equipment Corporation feels disadvantaged. Consequently, the company proposes to increase the percent of active material in 72265-1.

The [redacted] inert ingredients claimed on the pending CSF are the same substances claimed on the current CSF, but the concentration of the propellant has been nearly doubled [redacted] at the expense of the "Solvent" and "Solvent / Carrier" components.

Product ingredient source information may be entitled to confidential treatment

Inert ingredient information may be entitled to confidential treatment

Increasing the amount of propellant in the canister likely would give the product more oomph and, consequently, a greater firing distance, other things being equal. However, added oomph could mean decreased evacuation time.

201.2 Efficacy Data

No data on the performance of the new formulation against bears were submitted. Efficacy against bears is inferred from accounts of experimental work and successful use of bear pepper sprays against bears, the inclusion of levels of Capsaicin and related capsaicinoids in the formulation which meet or exceed the level reported for the tests and actual use accounts, and the results of tests on the spray characteristics of specific product-and-container combinations. Thus, Security has run and reported on spray tests for the two sizes of container that it seeks to use with the new formulation.

The spray test reports are cited below.

Nance, R. (2003a) Shot pattern study 7.9 oz (225 gr.) Frontiersman Bear Attack Deterrent. Unpublished Report, Security Equipment Corporation, Fenton, MO, 13 pp.

MRID# 461405-05

Nance, R. (2003b) Shot pattern study 9.2 oz (260 gr.) Frontiersman Bear Attack Deterrent. Unpublished Report, Security Equipment Corporation, Fenton, MO, 13 pp.

MRID# 461406-06

These reports describe tests which were run concurrently using essentially identical procedures. Nance and his helpers set up a stack of taped-together boxes such that they formed a wall 9' high and 12' wide. Down the middle of the wall of boxes, they hung white targets. The first targets used were "white bed sheets". Later a "white sheet draped over plastic" was used so that the specks of red spray would be easier to spot. Finally, they "tried the back of a white plastic banner advertising banner" which, Nance reports, "was better able help us capture the red particles from the FRONTIERSMAN spray." From CD video (and audio) recording of the trials, it seems that the banner was not changed between trials and that some touching to assess freshness of deposits was employed to determine whether specks on the banner were from the most recently fired canister.

The target wall was set up perpendicular to one of the outside walls of Security's facility in Fenton. Black tape was affixed to the outer siding of the building to demarcate firing positions so that the shooter would reliably be positioned 15', 20', 25', 30', or 35' from the target and so that the distance indicators would be apparent on the video recording.

Some trials were performed on each day from 8/5/03 through 8/8/03. Temperatures at test time reportedly were 78-85°F on test days, with just one temperature reading reported for each day. A "Winds Calm" indication was made for each test day, but wind speeds were not reported.

For each size of container, test samples reportedly were drawn at random from lots of 200 made up for the trials and (by inference) containing the proposed new formulation for the product. As noted above, that formulation not only is to be 2.0% rather than 1.4% total capsaicinoids but also is to be 50% propellant rather than the 26.87% claimed for the product's current formulation. The extra propellant has been proposed for the purpose of extending the firing range of the canister from the 18-25' supported by the spray pattern test on the current formulation to 30' for the 7.9-oz size and 35' for the 9.2-oz size. The impetus for this change probably also comes from competitors' challenges, but added spray range might well have positive human safety effects (as well as perceptions thereof).

Results of the spray pattern testing are summarized in Table 1 for the 7.9-oz canisters and in Table 2 for the 9.2-oz size. Detectable spray specks reached targets at all distances from which canisters were fired. In the videotaped trials (mostly from 8/8/03), a video recorder shrouded with a transparent shield was mounted in front of the target, thereby giving a view of the shooter and the impinging spray. In all such cases, the shield was hit with many particles. In only one of

those trials did it appear that there was significant ambient wind, judging from the movements of tree branches in the background. In that case (canister #151), coverage of the shield was especially heavy. Wind speed and direction should be monitored and recorded whenever spray pattern testing is performed outdoors.

All spray patterns reportedly were at least 7.5 feet high and 8 feet wide. With such patterns, it would seem that the user's aim would only have to be somewhat accurate to intercept a charging bear under conditions of mild to moderate winds.

The video documentation of testing indicates that height and width of spray patterns were measured rather crudely, usually only to the nearest half of a foot and, in the case of height, often with a bend in the metal tape (which would have had the effect of exaggerating the measured distance somewhat. However, it was evident that the spray often went beyond one or both of the relevant dimensions of the box wall, which was 9' high and 12' wide. The suggestions in the reported data (Tables 1 and 2) that patterns got a bit larger with increased distance from the target should not be taken too seriously, although such would have been the predicted result. The numbers to the right of the decimal points in the data for Pattern Means in Tables 1 and 2 should be regarded as false precision.

The data on evacuation times are essentially consistent with 5-second claims for both container sizes. Such times should be measured from the onset of firing until the spray cloud starts to peter out, rather than until the last evidence of firing is apparent. Although before ("00:00.00") and after views of the stop watch were shown in the video recorded trials, exactly when the watch was stopped could not be seen. My impression was that the reported times were about right, based upon what I was observing and "thousand-one, thousand-two" counting in some cases.

For the 7.9-oz container, the average evacuation time (5.42 sec) was inflated by longer times for the shorter distances, especially 15'. The longest reported evacuation time, by more than a second, was for 7.9-oz container #200. It is possible that the timer waited too long in that case.

For the 7.9-oz container, reported evacuation times were more variable (standard deviation = 0.72 sec) than for the 9.2 ouncer (STD = 0.29 sec). Seven of the 21 reported times for evacuation of 7.9-oz canisters were under 5 seconds, but all of those were consistent with a 5-second claim when rounded to the nearest half second.

For the 9.2-oz container, the average evacuation time was 5.52 seconds, but only 12 of the 23 cans had a reported evacuation time of 5.5 seconds or more. Of the 11 cans with evacuation times below 5.5 seconds, 8 were equivalent to 5.5 seconds when rounded to the nearest half second. The other 3 cans included one at 5.25 seconds (midway between 5.0 and 5.5 seconds), one that rounded to 5.0 seconds, and one that rounded to 4.5 seconds. That outlier and the 9 other cans that came in below 5.5 seconds indicate to me that allowing a 5.5-second evacuation time would be too generous.

In the potential life-and-death circumstances to which use of a product like 72265-1, evacuation-time claims should be on the conservative side. I had more of a struggle deciding between 4.5 and 5 seconds for the 7.9-oz canister than on rejecting the proposed 5.5-second claim in favor of 5 seconds for the 9.2 ouncer.

The trials to determine the number of bursts of approximately 1-second's duration that cans could deliver consisted of test-firing of 2 cans of each size. Those tests were video recorded. My notes from observing the recorded tests indicate that the two 9.2-oz canisters tested produced 6 and 7 of what I would call "good" bursts. With only two cans having been tested, I will have to go with the lower number. The two 7.9-oz cans, both gave 5 good bursts, although the narrator said "about 5, 6" for can #217 and "about 5½ to 6" for can #218.

201.3 Label

The only highlighted items on the proposed revised canister labels are the statements of net contents and the claims for "**effective range**" and evacuation times. The range claims proposed are supported by the data and other documentation supplied. The evacuation time claim (5 sec) proposed for the 7.9 oz container is acceptable, but that same claim will have to appear on the label for the 9.2-oz container rather than the proposed claim of 5.5 sec.

The materials sent for my review did not include proposed revised labeling for outer packaging. Such labeling would have to be consistent with the canister label.

202.0 CONCLUSIONS

1. The spray pattern data reported for the 7.9-oz container in the document assigned MRID No. 461406-05 and the CD video recordings of some of the trials support the claims indicated below.

   Spray Distance: 30 feet
   Spray Duration (meaningful evacuation time): 5 seconds
   Number of One-second Bursts: 5

   Of the 21 cans evacuated, reported spray durations met or exceeded 5 seconds in 14 cases. When rounded to the nearest half second, the other 7 times all rounded to 5 seconds.

2. The spray pattern data reported for the 9.2-oz container in the document assigned MRID No. 461406-06 and the CD video recordings of some of the trials support the claims indicated below.

   Spray Distance: 35 feet
   Spray Duration (meaningful evacuation time): 5 seconds
   Number of One-second Bursts: 6

   Of the 23 cans evacuated, reported times exceeded the proposed claim of 5.5 seconds 12 times -- just over 50%. When rounded to the nearest half second, several times were below 5.5 seconds, including one that rounded to 4.5 seconds. Consequently, a claim of 5 seconds is more appropriate than 5.5 seconds for this container size.

3. Evacuation time claims on labels for the 9.2-oz and 7.9 oz containers both must read "This canister empties in approximately 5 seconds." The pending label for the 9.2-oz container must be changed to reflect the accepted claim.

   The maximum spray distance claim for the 7.9-oz container is 30 feet.

   The maximum spray distance claim for the 9.2-oz container is 35 feet.

4. Submit copies of all elements of labeling in addition to the container labels that are to be altered in any way because of the change in product formulation or the changes in spray characteristics.

William W. Jacobs
Biologist
Insecticide-Rodenticide Branch
November 8, 2004

Table 1. Spraying data for 7.9-oz Frontiersman canister.

Can #	Test Date	Evac. Time (sec.)	Distance from Target (feet)	Pattern Height (feet)	Pattern Width (feet)
200	8/5/2003	7.69	15	8	8
220	8/6/2003	5.00	15	8	8
230	8/7/2003	5.90	15	8	9
205	8/8/2003	6.60	15	8.5	10.5
Pattern Means				8.125	8.875
201	8/5/2003	6.15	20	8.5	11
221	8/6/2003	5.65	20	8.5	10
231	8/7/2003	4.85	20	8.5	10
206	8/8/2003	5.66	20	8.5	11.5
Pattern Means				8.5	10.625
202	8/5/2003	4.82	25	8.5	12
222	8/6/2003	5.09	25	8.5	12
232	8/7/2003	4.85	25	9	10.5
207	8/8/2003	4.94	25	8.5	12
Pattern Means				8.625	11.625
203	8/5/2003	5.06	30	8.5	12
223	8/6/2003	4.80	30	9	12
233	8/7/2003	5.37	30	9	11
211	8/8/2003	4.90	30	8	8
212	8/8/2003	5.97	30	8	10
213	8/8/2003	4.78	30	8.5	10
214	8/8/2003	5.00	30	8	8
215	8/8/2003	5.65	30	8	9
216	8/8/2003	5.06	30	8.5	10
Pattern Means				8.388889	10

Time Summary Data

Number Tested	21
Mean Time	5.42
Standard Deviation	0.72
Times =>5 sec	14
Times Rounding to =>5 sec	21

Table 2. Spraying data for 9.2-oz Frontiersman canister.

Can #	Test Date	Evac. Time (sec.)	Distance from Target (feet)	Pattern Height (feet)	Pattern Width (feet)
101	8/5/2003	5.68	15	7.5	10
120	8/6/2003	5.40	15	8	10
130	8/7/2003	5.31	15	7.5	10
110	8/8/2003	6.09	15	8.5	11
Pattern Means				7.875	10.25
102	8/5/2003	5.41	20	8	10
121	8/6/2003	5.40	20	8.5	10
131	8/7/2003	5.72	20	8	10
111	8/8/2003	6.10	20	8.5	12
Pattern Means				8.25	10.5
103	8/5/2003	5.66	25	8.6	10
122	8/6/2003	5.70	25	8.6	10
132	8/7/2003	5.63	25	6.5	10
112	8/8/2003	5.90	25	8.5	12
Pattern Means				8.05	10.5
104	8/5/2003	5.38	30	9	10
123	8/6/2003	5.53	30	9	10
133	8/7/2003	5.54	30	8.5	10
107	8/8/2003	5.44	30	9	9
109	8/8/2003	4.68	30	9	9
Pattern Means				8.9	9.6
105	8/5/2003	5.60	35	9	10.5
124	8/6/2003	5.56	35	9	10
134	8/7/2003	5.47	35	8.5	10
150	8/8/2003	5.25	35	8.5	10
151	8/8/2003	5.44	35	8.5	10
152	8/8/2003	5.15	35	8.5	10
Pattern Means				8.666667	10.08333

Time Summary Data	
Number Tested	23
Mean Time	5.52
Standard Deviation	0.29
Times =>5 sec	22
Times Rounding to =>5 sec	22
Times =>5.5 sec	12
Times Rounding to =>5.5 sec	19

Bill

DP #: (303991)

Decision #: 336903

DATA PACKAGE BEAN SHEET

Date: 09-Jun-2004

* * * Registration Information * * *

Registration: 72265-1 - FRONTIERSMAN BEAR ATTACK DETERRENT

Company: 72265 - SECURITY EQUIPMENT CORPORATION

Risk Manager: RM 07 - John Hebert - (703) 308-6249 Room# CM-2 213

Risk Manager Reviewer: Daniel Peacock DPEACOCK

Sent Date: _____ Calculated Due Date: 30-Aug-2004 Edited Due Date: _____

Type of Registration: Product Registration - Section 3

Action Desc: (320) DATA REQUIRED;LABEL REVISION;

Ingredients: 070701, Capsaicin(1.4%)

* * * Data Package Information * * *

Expedite: ○ Yes ● No Date Sent: 09-Jun-2004 Due Back: _____

DP Ingredient: 070701, Capsaicin

DP Title: _____

CSF Included: ○ Yes ● No Label Included: ○ Yes ● No Parent DP #: _____

	Assigned To	Date In	Date Out		
Organization:	RD / IRB			Administrative Due Date:	18-Aug-2004
Team Name:				Negotiated Due Date:	
Reviewer Name:				Projected Completion Date:	
Contractor Name:					

* * * Studies Sent for Review * * *

Printed on Page 2

* * * Additional Data Package for this Decision * * *

No Additional Data Packages

* * * Data Package Instructions * * *

Bill,

Please review this request to amend this registration to:

1. increase the % of active from 1.4% to 2.0% active,
2. switch to a more concentrated source of active,
3. add a new 8 oz can to their current 9.2 oz can,
4. to revise the shot pattern study for the 9.2 oz can
5. to increase the distance claim to 35 feet or 35 feet
6. to increase the time needed to empty can to 5.15 sec

I am sending you the following documents:

1. Co ltr. of 11-12-2003, including list of submitted data,
2. Amended application form of 11-17-2004,
3. Revised CSF of 8-27-2003 11-14-2003
4. Shot Pattern Test for 7.9 oz size (MRID No. 461406-05) and 7.9 oz size (MRID No. 461406-06)
5. Two CSF with Shot Pattern Studies for 7.9 and 9.2 oz

5. Two CDs with Shot Pattern Studies for 7.9 and 9.2 oz.
6. Can Labels

2 labels 7.9, 5.0 sec, 30 ft
9.2, 5.5 sec, 35 ft

If you have any questions, please contact me.

Note: The company will be appying for a small business waiver very soon.

If you have any questios, please contact me.

Dan Peacock, 305-5407

DP#: (303991) *** Studies Sent for Review *** Decision#: (336903)

MRID	Citation Reference	Guideline
46140605	Nance, R. (2003) Shot Pattern Study 7.9 oz. (225 gr.) Frontiersman Bear Attack Deterrent. Project Number: SPS/7/9, FBAD0903/7/9. Unpublished study prepared by Security Equipment Corporation. 13 p.	
46140606	Nance, R. (2003) Shot Pattern Study 9.2 oz. (260 gr.) Frontiersman Bear Attack Deterrent. Project Number: SPS/9/2, FBAD0903/9/2. Unpublished study prepared by Security Equipment Corporation. 13 p.	

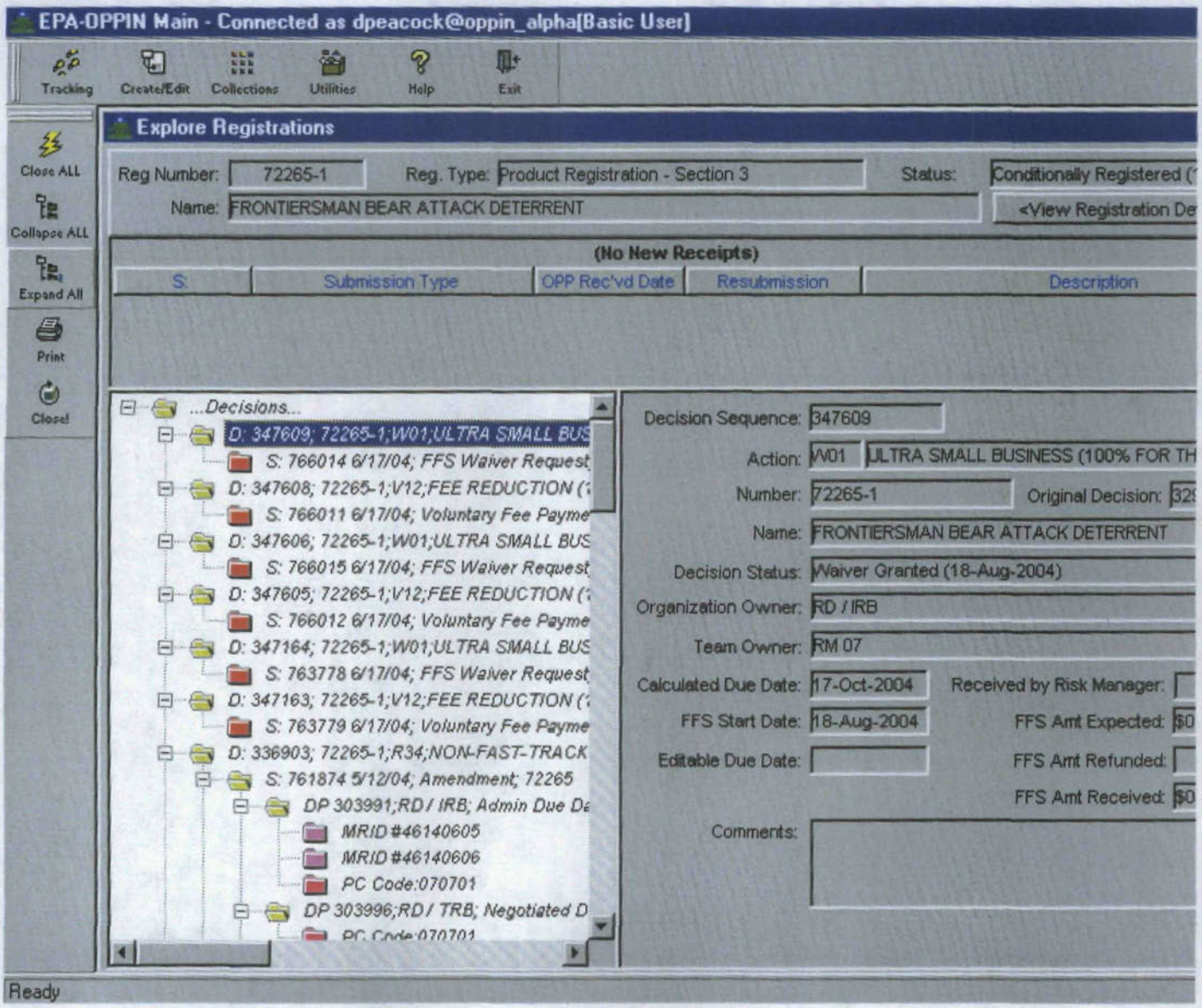
Dan Peacock
08/19/04 08:55 AM

To: Shyam Mathur/DC/USEPA/US@EPA, John Redden/DC/USEPA/US@EPA, Bill Jacobs/DC/USEPA/US@EPA
cc: John Hebert/DC/USEPA/US@EPA, Thomas Harris/DC/USEPA/US@EPA
Subject: Ultra Small Business Waiver Granted for 72265-1

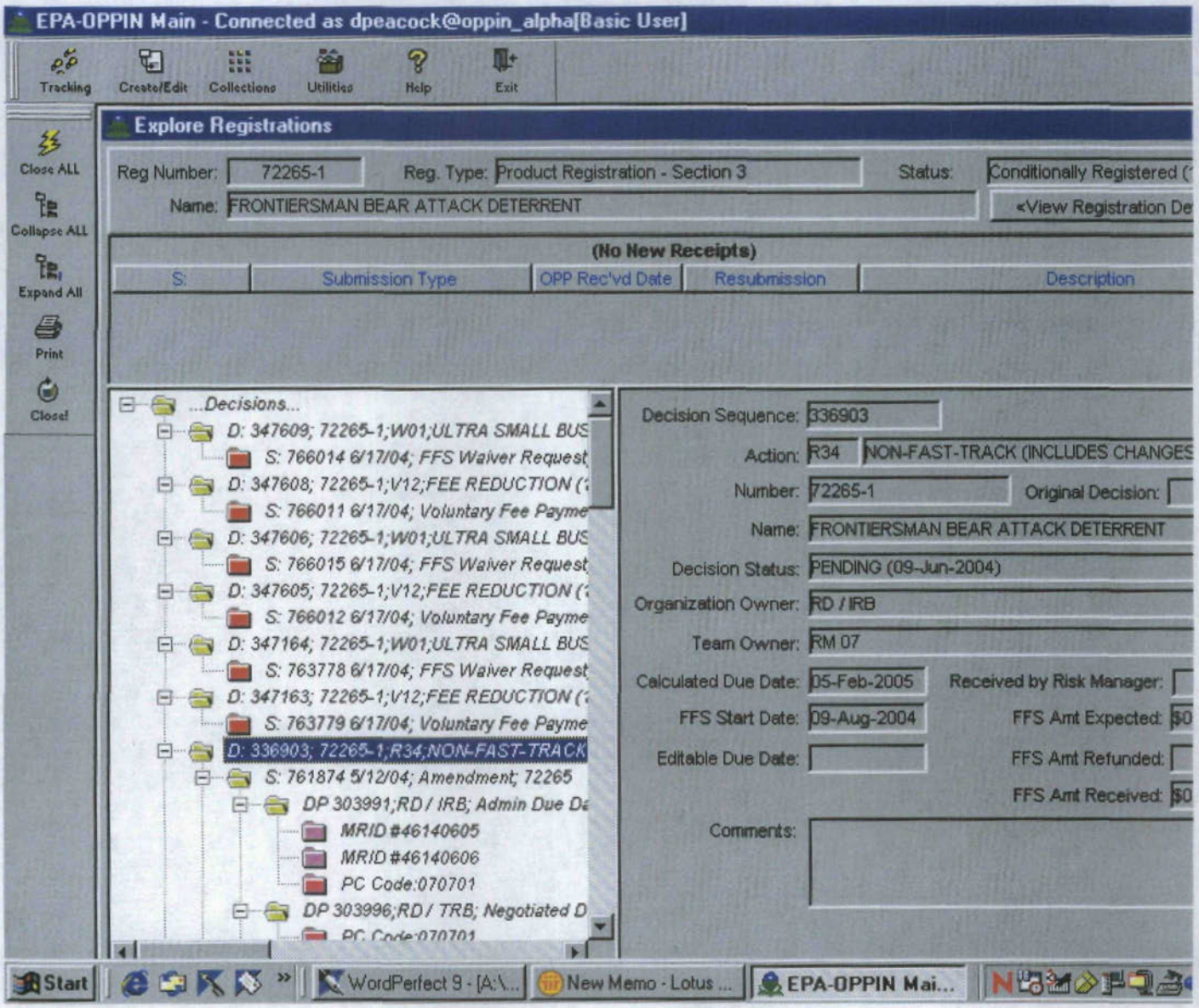
Shyam, John, and Bill,

On June 9, 2004 I sent all three of you a FFS Action (Code 34) for which the Co had requested a 100% Fee Waiver (Decision 336903, DP 303991, 303996, and 303998.)

EPA granted the waiver on August 18, 2004, as documented below under "Decision Status".



The FFS Due Date is February 5, 2005, as documented below, under "Calculated Due Date".



I am including print screens documenting the Waiver Granted date and the Calculated Due Date because these dates appear under different Decision Numbers, a fact that can be very confusing.

If you have any questions about this action, please let me know.

Thank You,

Daniel B. Peacock, Biologist
Insecticide-Rodenticide Branch
Registration Division (7504C)
1200 Pennsylvania Ave. NW
Washington, DC 20460

Tel: 703-305-5407
Fax: 703-305-6596
E-Mail: peacock.dan@epa.gov

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

OFFICE OF PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

October 4, 2004

MEMORANDUM

Subject:	Name of Pesticide Product:	Frontiersman Bear Attack Deterrent	
	EPA Reg. No.:	72265-1	
	DP Barcode:	D303998	
	Decision No.:	336903	
	PC Code:	070701	Capsaicin

From: Breann Hanson, Toxicologist BH
Technical Review Branch
Registration Division (7505C)

Byron T. Brown 10/04/2004

To: Daniel Peacock, RM Team 07
Insecticide-Rodenticide Branch
Registration Division (7505C)

Applicant: Security Equipment Corporation
330 Sun Valley Circle
Fenton, MO 63026

FORMULATION FROM LABEL:

Active Ingredients:			% by wt.
070701	Capsaicin and related capsaicinoids	CAS No. 404-86-4	2.0%
Inert Ingredients:			98.0%
		Total:	100%

ACTION REQUESTED:

The Product Manager requests:
"Please review this request to amend this registration to:

1. Increase the % of active from 1.4% to 2.0% active,
2. Switch to a more concentrated source of active,
3. Add a new 8 oz can to their current 9.2 ox can,
4. To revise the shot pattern study for the 9.2 oz can,
5. To increase the distance claim to 35 feet.

I am sending you the following documents:

1. Co. ltr of 11-12-2003, including list of submitted data,
2. Amended application form of 11-17-2003,
3. Revised CSF of 8-27-2003 and 11-14-2003,
4. Eye irritation (46202702) and skin irritation (46202703)
5. Can labels"

BACKGROUND: Security Equipment Corporation has submitted primary eye and primary skin irritation studies in support of registration for Frontiersman Bear Attack Deterrent, EPA Reg. No.: 72265-1. The company is increasing the percent of active ingredients from 1.4 to 2.0%. The submission included a CSF and label, letter from the company and an amended application form. The studies were conducted at Product Safety Laboratories, Dayton, New Jersey with assigned MRID numbers 462027-02 and -03. The remaining acute toxicity studies were not received by TRB yet the product was conditionally registered according to a previous TRB review (Backus, EPA File Symbol: 72256-R, D254068, 04-09-1999).

RECOMMENDATIONS: The two studies have been reviewed and the primary dermal irritation study is classified as acceptable. The primary eye irritation study is classified as unacceptable due to the fact that the test substance was instilled rather than sprayed. When instilled, the formulation is in toxicity category II in terms of eye irritation potential. However, this does not adequately address the hazard potential, including trauma, of in-use exposure particularly since the label claims to have an effective range of 30 feet and empties in approximately 5 seconds. **In lieu of an acceptable primary eye irritation study the product will be classified as having a toxicity category of I for eye irritation, resulting in the signal word DANGER.**

According to the previous TRB memo, the product was conditionally registered based on "what we know about the toxicology of capsaicin and related capsaicinoids, and taking into account the toxicity of the inert ingredients" as toxicity category IV for all tests except the primary eye irritation, and also labelled as a non-sensitizer. Although no studies were submitted backing these claims, enough is known about products of this type to concur with TRBs previous assessment.

TRB does not make recommendations as to new can sizes, shot patterns or distance claims.

The acute toxicity profile for Frontiersman Bear Attack Deterrent, EPA Reg. No.: 72265-1, is:

Acute oral toxicity	IV	Cited	
Acute dermal toxicity	IV	Cited	
Acute inhalation toxicity	IV	Cited	
Primary eye irritation	I	Unacceptable	MRID 46202702
Primary skin irritation	IV	Acceptable	MRID 46202703
Dermal sensitization	Negative	Cited	

Note to RM: Due to the expected use of this product, restricted use classification may not be necessary if labelling allays the requirement for restricted use classification. Also, since the results of the eye irritation study may not fully indicate the potential hazard by this exposure route, the product may require child resistant packaging if not classified as restricted use.

Also, no Quality Assurance statements were provided for either study. However, because signed GLP statements are included, the primary skin irritation study is still classified as acceptable.

LABELING: Based on the toxicity profile above, the following are the precautionary and first aid statements for this product as obtained from the Label Review System:

PRODUCT ID #: **072265-00001**

PRODUCT NAME: Frontiersman Bear Attack Deterrent

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals:

SIGNAL WORD: DANGER

[Restricted Use Pesticide due to toxicity categories. For retail sale to and use only by Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicator's certification OR Child Resistant Packaging Required.]

Causes irreversible eye damage. Do not get in eyes or on clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse.

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.
-Call a poison control center or doctor for treatment advice.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-xxx-xxxx for emergency medical treatment information.

Cat II
revised formula

Reviewer: Breann Hanson **Date:** Oct. 4, 2004
Risk Manager (EPA): Dan Peacock, RM 07

STUDY TYPE: Primary Eye Irritation - NZW Rabbit, OPPTS 870.2400; OECD 405

TEST MATERIAL: 10% 3MM Oleoresin Capsaicin (Major Capsaicinoids: 2.06%; Lot # CAP1075/3644; Batch #072402, dark red liquid)

CITATION: Merkel, D. (2002) Primary Eye Irritation of FRONTIERSMAN Bear Attack Deterrent. Project ID Number: PEI. Unpublished study prepared by Product Safety Laboratories. August 20, 2002. MRID 46202702.

SPONSOR: Security Equipment Corporation, 330 Sun Valley Circle, Fenton, MO 63026

EXECUTIVE SUMMARY: In a primary eye irritation study (MRID 46202702), 0.1 mL of 10% 3MM Oleoresin Capsaicin (Major Capsaicinoids: 2.06%; Lot # CAP1075/3644; Batch #072402, dark red liquid) was instilled into the conjunctival sac of the right eye of 3 New Zealand albino rabbits (1 male, 2 females; Age: unreported; Source: Davidson's Mill Farm, South Brunswick, NJ). The untreated left eye served as a control. Animals were then observed at 1, 24, 48, 72 hours and on days 4, 7 and 10 post-instillation. Irritation was scored according to Draize.

One hour after instillation 3/3 eyes exhibited conjunctivitis redness, chemosis and discharge (scores 2). At 24 hours all eyes also exhibited corneal opacity (score 1) and iritis (score 1). Conjunctivitis and iritis cleared up in all eyes by day 7. Corneal opacity continued in all eyes through study day 7 . All animals were free of ocular irritation by study day 10.

The test substance is moderately irritating. In this study, 10% 3MM Oleoresin Capsaicin is classified as EPA Toxicity Category II.

This study is classified as unacceptable. It does not satisfy the guideline requirement for a primary eye irritation study (OPPTS 870.2400; OECD 405) in the rabbit due to the fact that the test substance was instilled rather than sprayed. When instilled, the formulation is in toxicity category II in terms of eye irritation potential. However, this does not adequately address the hazard potential, including trauma, of in-use exposure particularly since the label claims to have an effective range of 30 feet and empties in approximately 5 seconds. **In lieu of an acceptable primary eye irritation study the product will be classified as having a toxicity category of I for eye irritation, resulting in the signal word DANGER.**

COMPLIANCE: Signed and dated GLP and Data Confidentiality statements were provided. No Quality Assurance was provided.

RESULTS AND DISCUSSION:

Observations	Number "positive"/number tested						
	Hours				Days		
	1	24	48	72	4	7	10
Corneal Opacity	0/3	3/3	3/3	3/3	3/3	3/3	0/3
Iritis	0/3	3/3	3/3	1/3	1/3	0/3	0/3
Conjunctivae:							
Redness*	3/3	3/3	3/3	3/3	1/3	0/3	0/3
Chemosis*	3/3	1/3	0/3	0/3	0/3	0/3	0/3
Discharge*	3/3	3/3	2/3	1/3	0/3	0/3	0/3

*Score of 2 or more required to be considered "positive"

A. **Observations** - One hour after instillation 3/3 eyes exhibited conjunctivitis redness, chemosis and discharge (scores 2). At 24 hours all eyes also exhibited corneal opacity (score 1) and iritis (score 1). Conjunctivitis and iritis cleared up in all eyes by day 7. Corneal opacity continued in all eyes through study day 7 . All animals were free of ocular irritation by study day 10.

B. **Reviewer's Conclusions:** Agree with the study author.

C. **Deficiencies:** This study is classified as unacceptable due to the fact that the test substance was instilled rather than sprayed. When instilled, the formulation is in toxicity category II in terms of eye irritation potential. However, this does not adequately address the hazard potential, including trauma, of in-use exposure particularly since the label claims to have an effective range of 30 feet and empties in approximately 5 seconds. **In lieu of an acceptable primary eye irritation study the product will be classified as having a toxicity category of I for eye irritation, resulting in the signal word DANGER.**

Reviewer: Breann Hanson **Date:** Oct. 4, 2004
Risk Manager (EPA): Daniel Peacock, RM 07

STUDY TYPE: Primary Dermal Irritation - NZW Rabbit; OPPTS 870.2500; OECD 404

TEST MATERIAL: 10% 3MM Oleoresin Capsaicin (Major Capsaicinoids: 2.06%; Lot # CAP1075/3644; Batch #072402, dark red liquid)

CITATION: Merkel, D. (2002) Primary Dermal Irritation of FRONTIERSMAN Bear Attack Deterrent. Project ID Number: PDI. Unpublished study prepared by Product Safety Laboratories. August 20, 2002. MRID 46202703.

SPONSOR: Security Equipment Corporation, 330 Sun Valley Circle, Fenton, MO 63026

EXECUTIVE SUMMARY: In a primary dermal irritation study (MRID 4202703), 3 New Zealand albino rabbits (2 males, 1 female; Age: unreported; Source: Davidson's Mill Farm, South Brunswick, NJ) were dermally exposed to 0.5 mL of 10% 3MM Oleoresin Capsaicin (Major Capsaicinoids: 2.06%; Lot # CAP1075/3644; Batch #072402, dark red liquid). The test substance was applied to a dose site on each animal, covered with a gauze pad and secured with a semi-occlusive tape for 4 hours. Animals were then observed for 72 hours. Dermal irritation was scored according to the Draize system at 1, 24, 48 and 72 hours post-patch removal.

One hour after patch removal 3/3 animals exhibited well-defined erythema (grade 2) and slight edema (score 2). All irritation had cleared by 72 hours.

In this study, the formulation is slightly irritating to the skin. 10% 3MM Oleoresin Capsaicin is classified as EPA Toxicity Category IV.

This study is classified as acceptable. It does satisfy the guideline requirement for a primary dermal irritation study (OPPTS 870.2500; OECD 404) in the rabbit.

COMPLIANCE: Signed and dated GLP and Data Confidentiality statements were provided. No Quality Assurance was provided.

RESULTS and DISCUSSION:

INDIVIDUAL SKIN IRRITATION SCORES

ERYTHEMA/EDEMA

Animal Number	Sex	Hours			
		1	24	48	72
8106	M	2/2	1/0	0/0	0/0
8107	F	2/2	1/1	1/0	0/0
8108	M	2/2	2/1	1/0	0/0
Severity of Irritation - Mean Score		2/2	1.3/0.7	0.7/0	0/0

A. Observations -One hour after patch removal 3/3 animals exhibited well-defined erythema (grade 2) and slight edema (score 2). All irritation had cleared by 72 hours.

B. Results - Test substance is slightly irritating to the skin. PDII = 1.7.

C. Reviewer's Conclusions - Agree with study author.

1. DP BARCODE: D303998
2. PC CODE: 070701
3. CURRENT DATE: 04/OCT/2004
4. TEST MATERIAL: 10% 3MM Oleoresin Capsaicin (Major Capsaicinoids: 2.06%; Lot # CAP1075/3644; Batch #072402, dark red liquid)

Study/Species/Lab Study # /Date	MRID	Results	Tox. Cat.	Core Grade
Primary eye irritation/rabbit Product Safety Labs. PEI/08-20-2002	46202702	3/3 conjunctivitis and at 1 hour, 3/3 opacity and iritis at 24 hours, no positive effects after 7 days	---	U
Primary dermal irritation/rabbit Product Safety Labs. PDI/08-20-2002	46202703	no irritation at 72 hours	IV	A

Core Grade Key: **A =Acceptable, S = Supplementary, U = Unacceptable, W = Waived**

DP #: (303998) Decision #: 336903

DATA PACKAGE BEAN SHEET

Date: 20-Aug-2004

VOL PAY

* * * Registration Information * * *

Registration: 72265-1 - FRONTIERSMAN BEAR ATTACK DETERRENT

Company: 72265 - SECURITY EQUIPMENT CORPORATION

Risk Manager: RM 07 - John Hebert - (703) 308-6249 Room# CM-2 213

Risk Manager Reviewer: Daniel Peacock DPEACOCK

Sent Date: Calculated Due Date: 08-Nov-2004 Edited Due Date:

Type of Registration: Product Registration - Section 3

Action Desc: (R34) NON-FAST-TRACK (INCLUDES CHANGES TO PRECAUTIONARY LABEL STATEMEN

Ingredients: 070701, Capsaicin(1.4%)

* * * Data Package Information * * *

Expedite: ○ Yes ● No Date Sent: 09-Jun-2004 Due Back:

DP Ingredient: 070701, Capsaicin

DP Title:

CSF Included: ○ Yes ● No Label Included: ○ Yes ● No Parent DP #:

	Assigned To	Date In	Date Out
Organization:	RD / TRB	22-Jun-2004	
Team Name:	TOX		
Reviewer Name:			
Contractor Name:			

Administrative Due Date: ~~05-Jan-2005~~

Negotiated Due Date: 05-Oct-2004

Projected Completion Date:

* * * Studies Sent for Review * * *

Printed on Page 2

* * * Additional Data Package for this Decision * * *

Printed on Page 3

* * * Data Package Instructions * * *

Toxicologist,

Please review this request to amend this registration to:

1. increase the % of active from 1.4% to 2.0% active,
2. switch to a more concentrated source of active,
3. add a new 8 oz can to their current 9.2 oz can,
4. to revise the shot pattern study for the 9.2 oz can.
5. to increase the distance claim to 35 feet

I am sending you the following documents:

1. Co ltr. of 11-12-2003, including list of submitted data,
2. Amended application form of 11-17-2004,
3. Revised CSF of 8-27-2003 and 11-14-2003
4. Eye Irritation (462027-02) and skin irritation (462027-03)
5. [illegible]

cited reviews

April 9, 1999

MEMORANDUM

EPA File Symbol: 72265-R Frontiersman Bear Attack Deterrent
DP Barcode: D254068
Case No: S558144
PC Code: 070701 Capsaicin (in oleoresin of capsicum)

From: Byron T. Backus, Ph.D., Toxicologist **/s/Byron T. Backus**
Technical Review Branch
Registration Division (7505C)

To: Grace Robiou/Tina Levine, PM 04
Insecticide-Rodenticide Branch
Registration Division (7505C)

Registrant: Security Equipment Corporation

ACTION REQUESTED: "Please review MRID 447632-02 and -03."

BACKGROUND: This package, as received by this reviewer, contains the following two acute toxicity studies on EPA File Symbol 72265-R: an eye irritation study (rabbit) in 44763202 and a dermal irritation study (rabbit) in 44763203. Both studies were conducted at Celsis Laboratory Group (Edison, NJ 08837). The proposed label for this product declares Capsaicin and related capsaicinoids as the sole active ingredient at 1.388%.

COMMENTS AND RECOMMENDATIONS:

The primary dermal irritation study has been classified as acceptable. However, the eye irritation study has been classified as unacceptalbe, as the manner (instillation, rather than spraying) by which the test material was administered the rabbit eyes did not adequately address the hazard potential (which would include trauma) of in-use exposure, particularly as the label includes the statement: "This product has an effective range of up to 18 feet. The canister empties in approximately 8 seconds." In lieu of an additional eye irritation study, we would accept a toxicity category I classification by this exposure route, with the signal word DANGER.

The following is a partial acute toxicity profile for this product, based on the data as received in this package:

Acute Oral LD50	-	Not received
Acute Dermal LD50	-	Not received
Acute Inhalation LC50	-	Not received
Primary Eye Irritation	-	Unacceptable
Primary Dermal Irritation	IV	Acceptable
Dermal Sensitization	-	Not received

Based on what we know about the toxicology of capsaicin and related capsaicinoids, and taking into account the toxicity of the "inert" ingredients, the following is the recommended acute toxicity profile for this product:

Acute Oral LD50	IV	Cited
Acute Dermal LD50	IV	Cited
Acute Inhalation LC50	IV	Cited
Primary Eye Irritation	I	Waived
Primary Dermal Irritation	IV	Acceptable
Dermal Sensitization	No	Cited

Based on this acute toxicity profile, the following is the recommended precautionary labeling for this product. This was obtained through the label review system, and then subsequently edited to remove all references to corrosivity (the potential toxicity category I eye effects would not be from corrosivity of the formulation, but rather from trauma).

Date: 04/09/99 LABEL REVIEW SYSTEM

ID #: 072265-00001 Frontiersman Bear Attack Deterrent

RESTRICTED USE CLASSIFICATION RECOMMENDED:

Due to eye irritation toxicity category.

The PM Team should decide if restricted use classification is necessary or if alternative labeling will allay the requirement for restricted use classification.

CHILD RESISTANT PACKAGING REQUIRED
[Note: this may or may not be appropriate for this product as it is not a corrosive formulation, and as the user may be in a situation where it is necessary to use this product on relatively short notice.]

SIGNAL WORD: DANGER

PRECAUTIONARY STATEMENTS:

Causes irreversible eye damage. Do not get in eyes or on clothing. Wear goggles or face shield.

STATEMENT OF PRACTICAL TREATMENT (SOPT):

IF IN EYES: Hold eyelids open and flush with steady, gentle stream of water for 15 minutes. Get medical attention.

NOTE TO PHYSICIAN:

Note to PM/CRM/Registrant: The proposed label should contain a "Note to Physician." The following statements are suggested types of information that may be included, if applicable:

- technical information on symptomatology;
- use of supportive treatments to maintain life functions;
- medicine that will counteract the specific physiological effects of the pesticide;
- company telephone number to specific medical personnel who can provide specialized medical advice.

The following should appear under the heading USER SAFETY RECOMMENDATIONS:

Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and wash clothing before reuse.

DATA REVIEW FOR PRIMARY EYE IRRITATION TESTING (870.2400, formerly §81-4)

Product Manager 04
MRID No.: 44763202

Reviewer: Byron T. Backus, Ph.D.
Study Completion Date: February 5, 1999
Study No.: #822483

Testing Facility: Celsis Laboratory Group
Author: Gilman, M. R.

Quality Assurance (40 CFR §160.12): Included (p. 5)
Test Material: Security Equipment Corporation Sample, Bear Repellent, Lot 120898-BS02, a dark brown liquid with a pH of 7.25.
Dosage: 0.1 mL

Species: Rabbits; Albino, New Zealand White
Age: Not stated
Weight: Not stated
Source: Trevanor Farm, Harpursville, NY 13787

Conclusion:

1. **Toxicity Category:** III (Moderate irritant) - for the formulation as tested
2. **Classification**: Not acceptable (see **Special Comments**)

Procedure (including deviations from 870.2400): "Each animal's eye was gently held open and 0.1 milliliters of the test material, in liquid state, was placed into the conjunctival sac of the test eye, then the lids were held shut for approximately one second..."

Observations	Number "positive"/number tested						
	Hours				Days		
	1	24	48	72	4	7	10
	Unwashed eyes						
Corneal Opacity	2/6	2/6	1/6	1/6	0/6	0/6	nd
Iritis	1/6	2/6	2/6	0/6	0/6	0/6	nd
Conjunctivae:							
Redness[a]	0/6	5/6	2/6	0/6	0/6	0/6	nd
Chemosis[a]	4/6	4/6	2/6	0/6	0/6	0/6	nd
Discharge[a]	6/6	5/6	5/6	0/6	0/6	0/6	nd

[a]Score of 2 or greater required to be considered a positive response.
Nd = not done

Summary: It is stated (p. 9) that: "The animals were monitored daily and found to be free of pain and distress." From p. 11: "Twenty-four hours post instillation, corneal opacity was noted in two of six animals; iritis in two animals, positive conjunctival irritation in five animals with minimal irritation in one animal... On study day 7, all signs of corneal opacity, iritis and conjunctival irritation had cleared..."

Special Comments: Although the performing laboratory indicates that the test formulation is in toxicity category II (according to the report, on p. 10, toxicity category II s defined as "Corneal opacity reversible within 7 days. Irritation persisting for 7 days.") this is incorrect, as the results would normally define a toxicity category III hazard potential in terms of eye exposure.

However, in this study, the test material was simply instilled ("using a 1cc sterile syringe") into the rabbit eyes. The label claims for this product include the following: "This product has an effective range of up to 18 feet. The canister empties in approximately 8 seconds." This indicates that the product is sprayed with considerable force. Normally, for a product of this type, testing would involve a one-second spray from a distance of 10 cm into the rabbit eye. However, in this particular case, we would waive the requirement for any further testing, as long as the registrant accepts that the product is in toxicity category I (signal word: DANGER) with appropriate labeling modifications (including deletion of all references to the formulation as corrosive) because of the potential mechanical trauma.

DATA REVIEW FOR PRIMARY DERMAL IRRITATION TESTING (870.2500, formerly §81-5)

Product Manager: 04
MRID No.: 44763203

Reviewer: Byron T. Backus, Ph.D.
Study Completion Date: February 3, 1999
Study No.: #822482

Testing Facility: Celsis Laboratory Group
Author: Gilman, M. R.

Quality Assurance (40 CFR §160.12): Included (p. 5)
Test Material: Security Equipment Corporation Sample, Bear Repellent, Lot 120898-BS02, a dark brown liquid with a pH of 7.25.
Dosage: 0.5 mL

Species: Rabbits; Albino, New Zealand White
Age: Not stated
Weight: Not stated
Source: Trevanor Farm, Harpursville, NY 13787

Conclusion:

1. **Toxicity Category:** IV (Slight irritant)
2. **Classification**: Acceptable

Procedure (including deviations from 870.2500): "The test material, as supplied, was exposed semi-occlusively to an area of skin approximately six centimeters square and covered with a gauze patch. The patch was held in place with non-irritating tape and covered with gauze which was then over wrapped with Elastikon tape to prevent ingestion of the test material."

Results: PDIS = 0.83. Very slight erythema (maximum score of 1) was noted on all six rabbits at 24, 48 and 72 hrs. There was no edema (all scores = 0).

Special Comments: None

ACUTE TOX ONE-LINERS

1. **DP BARCODE:** D254068
2. **PC CODE:** 070701 Capsaicin (in oleoresin of capsicum)
3. **CURRENT DATE:** April 9, 1999
4. **TEST MATERIAL:** Security Equipment Corporation Sample, Bear Repellent, Lot 120898-BS02, a dark brown liquid with a pH of 7.25

Study/Species/Lab Study #/Date	MRID	Results	Tox. Cat.	Core Grade
Primary eye irritation/rabbit/ Celsis Laboratory Group/#822483/FEB-5-1999	44763202	Corneal opacity in 2/6 eyes at 24 hrs; iritis in 2/6 eyes at 24 hrs. All scores zero by day 7. However, 0.1 mL test material was instilled in rabbit eye using a syringe; proposed product has label claims of an effective range up to 18 feet and states that the canister empties in about 8 seconds, indicating potential for mechanical trauma.	-	U
Primary dermal irritation/rabbit/Celsis Laboratory Group/#822482/FEB-3-1999	44763203	PDIS = 0.83. Very slight erythema (score = 1) noted for all six rabbits at 24, 48 and 72 hrs; no edema (all scores = 0).	IV	A

Core Grade Key: **A =Acceptable, S = Supplementary, U = Unacceptable, V = Self Validated**

FEE

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

OPPTS/OPP/RD/TRB/PRODUCT CHEMISTRY TEAM

WASHINGTON, D.C. 20460

DATE OUT: September 15, 2004

SUBJECT: FEE: Product Chemistry Review Of Frontiersman Bear Attack Deterrent

DP BARCODE No.:	303996
REG./File Symbol No.:	72265-1
PC CODE:	070701
USE:	Non-Food

FROM: Linda L. Kutney, Chemist
Product Chemistry Team
Technical Review Branch/RD (7505C)

TO: John Hebert, Daniel Peacock RM-07
Insecticide Rodenticide Branch/ RD (7505C)

INTRODUCTION:

The Registrant, Security Equipment Corp., has submitted a five-batch analysis, other product chemistry data and a basic CSF (dated 11/14/03) to support registration of their product, Frontiersman Bear Attack Deterrent. The label claim for this product is 2.0% Capsaicin and related capsaicinoids. Data were submitted under MRIDs 46140601 and 46234001.

Following conversations with the Registrants (Larry and Robert Nance's, 636-343-0200), a revised CSF was submitted, dated 9/15/04.

SUMMARY OF FINDINGS:

1. The previously accepted label is still acceptable.
2. All of the inert components used are acceptable for the proposed non-food uses.
3. The five-batch analysis (See Confidential Appendix) supports the revised CSF.
4. The new product has a pH of 4.0, where the old product had a pH of 7.1, possibly due to test method differences. This pH is acceptable.

TRB CONCLUSIONS:

The revised CSF, dated 9/15/04, for Frontiersman Bear Attack Deterrant, Reg. No. 72265-1, is acceptable.

Manufacturing process information may be entitled to confidential treatment

CONFIDENTIAL APPENDIX:

[redacted]

DP #: (303996)

Decision #: 336903

DATA PACKAGE BEAN SHEET

Date: 09-Jun-2004

* * * Registration Information * * *

Registration: 72265-1 - FRONTIERSMAN BEAR ATTACK DETERRENT

Company: 72265 - SECURITY EQUIPMENT CORPORATION

Risk Manager: RM 07 - John Hebert - (703) 308-6249 Room# CM-2 213

Risk Manager Reviewer: Daniel Peacock DPEACOCK

Sent Date: Calculated Due Date: 30-Aug-2004 Edited Due Date:

Type of Registration: Product Registration - Section 3

Action Desc: (320) DATA REQUIRED;LABEL REVISION;

Ingredients: 070701, Capsaicin(1.4%)

* * * Data Package Information * * *

Expedite: ○ Yes ● No Date Sent: 09-Jun-2004 Due Back:

DP Ingredient: 070701, Capsaicin

DP Title:

CSF Included: ○ Yes ● No Label Included: ○ Yes ● No Parent DP #:

	Assigned To	Date In	Date Out		
Organization:	RD / TRB			Administrative Due Date:	18-Aug-2004
Team Name:				Negotiated Due Date:	
Reviewer Name:				Projected Completion Date:	
Contractor Name:					

* * * Studies Sent for Review * * *

No Studies

* * * Additional Data Package for this Decision * * *

Printed on Page 2

* * * Data Package Instructions * * *

Chemist,

Please review this request to amend this registration to:

1. increase the % of active from 1.4% to 2.0% active,
2. switch to a more concentrated source of active,
3. add a new 8 oz can to their current 9.2 oz can,
4. to revise the shot pattern study for the 9.2 oz can.
5. to increase the distance claim to 35 feet

I am sending you the following documents:

1. Co ltr. of 11-12-2003, including list of submitted data,
2. Amended application form of 11-17-2004,
3. Revised CSF of 8-27-2003 and 11-14-2003
4. Chemistry data (461406-01 and 462340-01)
5. Can Labels

p. Can Labels

If you have any questions, please contact me.

Note: The company will be applying for a small business waiver very soon.

If you have any questions, please contact me.

DP#: (303996) *** Additional Data Package for this Decision *** Decision#: (336903)

DP #	Division/Branch	Date Sent	Date Due	Instructions?	CSF	label
303991	RD / IRB	09-Jun-2004	31-Jan-2005	○ Yes ○ No	○ Yes ● No	○ Yes ● No
303991	RD / IRB	09-Jun-2004	31-Jan-2005	○ Yes ○ No	○ Yes ● No	○ Yes ● No
303998	RD / IRB	09-Jun-2004	05-Oct-2004	○ Yes ○ No	○ Yes ● No	○ Yes ● No
303998	RD / TRB	09-Jun-2004	05-Oct-2004	○ Yes ○ No	○ Yes ● No	○ Yes ● No

Bob Nance

6/7/2004
3:30 PM

I called him, and advised him about "Fee for Service".
He has downloaded the information & will talk to Alexandra Zikely at 703-305-6603

Dan Peacock, Home Disk 13, A:\Sale of Home\Suggested Selling Points, 6-3-2004.doc

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

May 12, 2004

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

SECURITY EQUIPMENT CORPORATION
330 SUN VALLEY CIRCLE
FENTON, MO 63026

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your submittal of 20-FEB-04. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 86-5. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.

Form Approved OMB No. 2070-0060

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460.
Do not send the completed form to this address.

Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number Security Equipment Corporation, 330 Sun Valley Circle, Fenton, MO 63026 Ph:636-343-0200	EPA Registration Number/File Symbol 72265-1
Active Ingredient(s) and/or representative test compound(s) Capsaicin and related capsaicinoids @ 2.0%	Date 11/14/03
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Domestic Outdoor	Product Name Frontiersman® Bear Attack Deterrent

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

☐ I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

☑ I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☐ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses .

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature	Date	Typed or Printed Name and Title
Robert A	11/14/2003	Robert Nance, V. P. of Operations

EPA Form 8570-34 (9-97) Electronic and Paper versions available. Submit only Paper version.

Form Approved OMB No. 2070-0060

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

Date 11/14/03			EPA Reg No./File Symbol 72265-1		Page 1 of 2
Applicant's/Registrant's Name & Address Security Equipment Corporation, 330 Sun Valley Circle, Fenton, MO 63026			Product Frontiersman® Bear Attack Deterrent		
Ingredient Capsaicin and related capsaicinoids @ 2.0%					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Group A Series 830-1550	Product identity and composition		Security Equipment Corporation	OWN	1
830-1600	Description of materials used to produce the product		Security Equipment Corporation	OWN	1
830-1750	Certified Limits		Security Equipment Corporation	OWN	1
Group B Series 830-6303	Physical State: Compressed liquid (aerosol)		Security Equipment Corporation	OWN	
830-6315	Flammability/flame extension: FE greater than 18 inches		Security Equipment Corporation	OWN	
830-6317	Storage Stability of Product		Security Equipment Corporation	OWN	
830-6320	Corrosion Characteristics		Security Equipment Corporation	OWN	
830-7000	PH: 4.0		Security Equipment Corporation	OWN	
830-7300	Density/relative density/bulk density: 6.74 pounds/gallon		Security Equipment Corporation	OWN	
40 CFR 158.340 81-4	Primary Eye Irritation		Security Equipment Corporation	OWN	
40 CFR 158.340 81-5	Primary Dermal Irritation		Security Equipment Corporation	OWN	
40 CFR 158.640 96-1	Bear Attack Deterrent		Security Equipment Corporation	OWN	
	NOTES: 1. Refer to Confidential Statement of Formula				
Signature			Name and Title Robert Nance V. P. of Operations		Date 11/14/03

EPA Form 8570-35 (9-97) Electronic and Paper versions available. Submit only Paper version.

Agency Internal Use Copy

Form Approved OMB No. 2070-0060

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

Date 11/14/03			EPA Reg No./File Symbol 72265-1		Page 1 of 2
Applicant's/Registrant's Name & Address Security Equipment Corporation, 330 Sun Valley Circle, Fenton, MO 63026			Product Frontiersman® Bear Attack Deterrent		
Ingredient Capsaicin and related capsaicinoids @ 2.0%					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
[redacted]			Security Equipment Corporation	OWN	
			Security Equipment Corporation	OWN	
			Security Equipment Corporation	OWN	
			Security Equipment Corporation	OWN	
			Security Equipment Corporation	OWN	
			Security Equipment Corporation	OWN	
			Security Equipment Corporation	OWN	
			Security Equipment Corporation	OWN	
			Security Equipment Corporation	OWN	
			Security Equipment Corporation	OWN	
			Security Equipment Corporation	OWN	
			Security Equipment Corporation	OWN	
Signature			Name and Title Robert Nance V. P. of Operations		Date 11/14/03

EPA Form 8570-35 (9-97) Electronic and Paper versions available. Submit only Paper version.

Public File Copy

Application for Pesticide – Section II (Continued)

Form 8570-1

I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

SECURITY
EQUIPMENT CORPORATION

462340-00

November 12, 2003

Document Processing Desk
Office of Pesticide Programs
U.S. Environmental Protection Agency
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

ATTN: Dan Peacock, Insecticide/Rodenticide Branch

Dear Mr. Peacock:

SUBJECT: Security Equipment Corporation
Frontiersman® Bear Attack Deterrent
EPA Registration Number 72265-1

This submission is being made for the amendment of EPA identification number 72265-1 to include each of the following:

1) to increase the percentage of active ingredient from 1.4% to 2.0%

2.) to switch to a more concentrated source of active

3.) to add a new 8 oz can to our current 9.2 oz can

4.) to revise the shot pattern study for the 9.2 oz can

Enclosed are the following items:

VOLUME 1 OF 7: ADMINISTRATIVE DOCUMENTS:
1. Application of Pesticide Amendment
2. Six Copies of the modified 9.2 oz (260 gram) Frontiersman label
3. Six Copies of the new 7.9 oz (225 gram) Frontiersman label
4. Confidential Statement of Formulation
5. Confidential Statement of Formulation for active ingredient
6. Certification with Respect to Citation of Data
7. Data Matrix [Agency Internal Use Copy]
8. Data Matrix [Public File Copy]

VOLUME 2 OF 7: PRODUCT CHEMISTRY DATA: 46140601
Nance, R. (2003): Product Chemistry of Frontiersman Bear Attack Deterrent. Unpublished study prepared by Security Equipment Corporation, Fenton, MO.

330 Sun Valley Circle
Fenton, MO 63026

(636) 343-0200
(800) 325-9568
(636) 343-1818 Fax

E-Mail: info@sabre-sabrered.com
http://www.sabre-sabrered.com

SECURITY
EQUIPMENT CORPORATION

VOLUME 3 OF 7: PRODUCT CHEMISTRY DATA: 46234001
Nance, R. (2003): Compilation of five batch analysis on new source of active ingredient. Compilation prepared by Security Equipment Corporation, Fenton, MO.

VOLUME 4 OF 7: ACUTE TOXICOLOGY DATA: 46202702
Merkel, D. (2003): Primary Eye Irritation Study in Rabbits. Unpublished study prepared by Product Safety Laboratories, Dayton, NJ.

VOLUME 5 OF 7: ACUTE TOXICOLOGY DATA: 46202703
Merkel, D. (2003): Primary Skin Irritation Study in Rabbits. Unpublished study prepared by Product Safety Laboratories, Dayton, NJ.

VOLUME 6 OF 7: PRODUCT PERFORMANCE DATA: 46140605
Nance, R. (2003): Compilation of Published Product Performance Data of Frontiersman Bear Deterrent (225 gram canister). Compilation prepared by Security Equipment Corporation, Fenton, MO.

VOLUME 7 OF 7: PRODUCT PERFORMANCE DATA: 46140606
Nance, R. (2003): Compilation of Published Product Performance Data of Frontiersman Bear Deterrent (260 gram canister). Compilation prepared by Security Equipment Corporation, Fenton, MO.

Company Official: Robert Nance — **Name** — **Signature**

Company Name: SECURITY EQUIPMENT CORPORATION

Company Contact: Robert Nance — **Name** — 636-343-0200 — **Phone**

330 Sun Valley Circle (636) 343-0200 E-Mail: info@sabre-sabrered.com

Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060, Approval expires 2-28-95

EPA

United States
Environmental Protection Agency
Washington, DC 20460

- [ ] Registration
- [x] Amendment
- [ ] Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number Security Equipment Corporation/72265-1	2. EPA Product Manager Dan Peacock	3. Proposed Classification [x] None [ ] Restricted
4. Company/Product (Name) Security Equipment Corp/Frontiersman Bear Attack Deterrent	PM#	
5. Name and Address of Applicant *(Include ZIP Code)* Security Equipment Corporation 330 Sun Valley Circle Fenton, MO 63026 [ ] *Check if this is a new address*	6. **Expedited Reveiw.** In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. 72265-1 Product Name Frontiersman Bear Attack Deterrent	

Section - II

- [x] Amendment - Explain below.
- [ ] Resubmission in response to Agency letter dated _____
- [ ] Notification - Explain below.
- [ ] Final printed labels in repsonse to Agency letter dated _____
- [ ] "Me Too" Application.
- [ ] Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

We would like accomplish four changes in this amendment, 1.) to increase the capsaicinoids in the Frontiersman Bear Attack Deterrent from 1.4% to 2.0%, 2.) to register a new source of active ingredient, 3.) to add an additional canister size of 225 grams (7.9 ozs.), and 4.) to revise the distance of the 260 gram (9.2 ozs.) canister from 18 to 25 feet, to 35 feet and the firing time from 5 seconds to 5.5 seconds by resubmitting a new shot pattern study based on the increase in propellant. This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. (Continued on next page). where

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging	Unit Packaging	Water Soluble Packaging	2. Type of Container
[ ] Yes [x] No	[ ] Yes [x] No	[ ] Yes [x] No	[x] Metal [ ] Plastic [ ] Glass [ ] Paper [ ] Other (Specify) _____
Certification must be submitted	If "Yes" Unit Packaging wgt. / No. per container	If "Yes" Package wgt / No. per container	

3. Location of Net Contents Information	4. Size(s) Retail Container	5. Location of Label Directions
[x] Label [ ] Container	9.2 fl. oz., 7.9 fl. oz.	[x] On Label

6. Manner in Which Label is Affixed to Product: [x] Lithograph [x] Paper glued [ ] Stenciled [ ] Other _____

Section - IV

1. Contact Point *(Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)*

Name	Title	Telephone No. (Include Area Code)
Robert Nance	Vice-President	636-343-0200

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowlingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

6. Date Application Received (Stamped)

2. Signature Robert A	3. Title Vice-President
4. Typed Name Robert Nance	5. Date 11/17/03

EPA Form 8570-1 (Rev. 3-94) Previous editions are obsolete. White - EPA File Copy (original) Yellow - Applicant Copy

35 B 6.1

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

August 18, 2004

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

OPP Decision Number: D-334902
EPA File Symbol or Registration Number: 72265-1
Product Name: FRONTIERSMAN BEAR ATTACK DETERRENT
EPA Receipt Date: 11-Sep-2003
EPA Company Number: 72265
Company Name: SECURITY EQUIPMENT CORPORATION

LARRY D. NANCE
SECURITY EQUIPMENT CORPORATION
330 SUN VALLEY CIRCLE
FENTON, MO 63026

SUBJECT: Approval of 100% Small Business Waiver Request

Dear Registrant:

The Office of Pesticide Programs has approved your request for 100% waiver of the pesticide registration fee associated with the action referenced above. The decision review period for this action begins on the date of this letter.

The Action has been identified as Action Code: R34

NON-FAST-TRACK (INCLUDES CHANGES TO PRECAUTIONARY LABEL STATEMENTS;SOURCE CHANGES TO AN UNREGISTERED SOURCE);

If you have any questions, please contact Pesticide Registration Service Fee Ombudsman, Linda Arrington at (703) 305-6249.

Sincerely,

Arnold E. Layne

Arnold E. Layne, Director
Information Resources and Services Division

to be put in jacket

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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

March 24, 2004

320 756822
10

[Note to Robert Nance]

Frontiersman Bear Attack Deterrent
EPA Reg. No. 72265-1

EPA screened the three volumes of data (Volumes 3, 4, and 5) that had failed the data formatting screen previously. We assigned the following MRID Numbers to these volumes:

Volume 3: We assigned no MRID number. See below.
Volume 4: MRID No. 462027-02
Volume 5: MRID No. 462027-03

The single sheet did not fix the problem for Volume 3. When you claim that part or all of a volume contains confidential material, you still need a 1) placeholder page in the nonconfidential section of the volume and 2) a "Confidential Appendix", even if claim the entire volume is confidential.

See the 1) March 17, 2004 "Report of Analysis for Compliance with PR Notice 86-5 and 2) the PR Notice itself, which is on our webpage (www.epa.gov) for details.

If you still have questions, call Ms. Teresa Downs at 703-305-5363.

From: Dan Peacock, Biologist DBPeacock
Insecticide-Rodenticide Branch
Registration Division
703-305-5407

Dan Peacock, Disk 141, A:\Capsaicin\72265-1, Note to Robert Nance, 3-24-2004.wpd

72265-1

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

March 17, 2004

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

SECURITY EQUIPMENT CORPORATION
330 SUN VALLEY CIRCLE
FENTON, MO 63026

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your submittal of 20-FEB-04. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your data submittal was found to be partially in compliance with the standards for submission of data contained in PR Notice 86-5, with the exceptions noted below. A copy of your transmittal bibliography is enclosed, annotated with the Master Record ID's (MRIDs) assigned to each document accepted. Please use these numbers in all future references to these documents.

If deficiencies were found which apply to individual accepted studies, they are listed below following the applicable MRID. Any document which has been assigned a MRID has been accepted under PR Notice 86-5. If any comments related to a MRID appear on this report, they are provided for your information and reference when preparing future submissions. Some individual documents were not acceptable, and all copies are being returned to you for correction for the reasons indicated below.

These rejected studies have been assigned separate identification numbers which are annotated on both the enclosed bibliography and the rejected document labels.

The rejected studies and their deficiencies are described below.

Rejected Study [01]:

* FIFRA Section 10(d)(1) only provides for confidentiality of information which: (A) discloses manufacturing or quality control processes, (B) discloses the details of any methods for testing, detecting, or measuring the quantity of any deliberately added inert ingredient of a pesticide, or (C) discloses the identity or percentage quantity of any deliberately added inert ingredient of a pesticide... Since your claim covers information entirely outsidethis narrow range of subject matter, it cannot be accepted.

462027-00

SECURITY
EQUIPMENT CORPORATION

November 12, 2003

Document Processing Desk
Office of Pesticide Programs
U.S. Environmental Protection Agency
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

ATTN: Dan Peacock, Insecticide/Rodenticide Branch

Dear Mr. Peacock:

SUBJECT: Security Equipment Corporation
Frontiersman® Bear Attack Deterrent
EPA Registration Number 72265-1

This submission is being made for the amendment of EPA identification number 72265-1 to include each of the following:

1) to increase the percentage of active ingredient from 1.4% to 2.0%

2.) to switch to a more concentrated source of active

3.) to add a new 8 oz can to our current 9.2 oz can

4.) to revise the shot pattern study for the 9.2 oz can

Enclosed are the following items:

VOLUME 1 OF 7: ADMINISTRATIVE DOCUMENTS:
1. Application of Pesticide Amendment
2. Six Copies of the modified 9.2 oz (260 gram) Frontiersman label
3. Six Copies of the new 7.9 oz (225 gram) Frontiersman label
4. Confidential Statement of Formulation
5. Confidential Statement of Formulation for active ingredient
6. Certification with Respect to Citation of Data
7. Data Matrix [Agency Internal Use Copy]
8. Data Matrix [Public File Copy]

VOLUME 2 OF 7: PRODUCT CHEMISTRY DATA: 46140601
Nance, R. (2003): Product Chemistry of Frontiersman Bear Attack Deterrent. Unpublished study prepared by Security Equipment Corporation, Fenton, MO.

330 Sun Valley Circle
Fenton, MO 63026

(636) 343-0200
(800) 325-9568
(636) 343-1318 Fax

E-Mail: info@sabre-sabrered.com
http://www.sabre-sabrered.com

SECURITY
EQUIPMENT CORPORATION

5-6-2008
Teresa said that it was backdated

VOLUME 3 OF 7: PRODUCT CHEMISTRY DATA: Reject (01)
Nance, R. (2003): Compilation of five batch analysis on new source of active ingredient. Compilation prepared by Security Equipment Corporation, Fenton, MO.

VOLUME 4 OF 7: ACUTE TOXICOLOGY DATA: 46202702
Merkel, D. (2003): Primary Eye Irritation Study in Rabbits. Unpublished study prepared by Product Safety Laboratories, Dayton, NJ.

VOLUME 5 OF 7: ACUTE TOXICOLOGY DATA: 46202703
Merkel, D. (2003): Primary Skin Irritation Study in Rabbits. Unpublished study prepared by Product Safety Laboratories, Dayton, NJ.

VOLUME 6 OF 7: PRODUCT PERFORMANCE DATA: 46140605
Nance, R. (2003): Compilation of Published Product Performance Data of Frontiersman Bear Deterrent (225 gram canister). Compilation prepared by Security Equipment Corporation, Fenton, MO.

VOLUME 7 OF 7: PRODUCT PERFORMANCE DATA: 46140606
Nance, R. (2003): Compilation of Published Product Performance Data of Frontiersman Bear Deterrent (260 gram canister). Compilation prepared by Security Equipment Corporation, Fenton, MO.

Company Official: Robert Nance — **Name** — Robert A — **Signature**

Company Name: SECURITY EQUIPMENT CORPORATION

Company Contact: Robert Nance — **Name** — 636-343-0200 — **Phone**

330 Sun Valley Circle
Fenton, MO 63026

(636) 343-0200
(800) 325-9568
(636) 343-1318 Fax

E-Mail: info@sabre-sabrered.com
http://www.sabre-sabrered.com

55 B6-2

Please Read All Instructions Before Completing this Form *(Form must be typed)* Form Approved. OMB No. 2070-0044. Approval Expires 1-31-95

United States
Environmental Protection Agency
Office of Pesticide Programs (7505C)
Washington, DC 20460

EPA

Notice of Supplemental Distribution of a Registered Pesticide Product

Instructions

After a registrant has obtained final registration for the basic product, the registrant may then supplementally distribute his/her product. One form must be submitted for each distributor product and must be signed by the distributor involved. The basic registration number and the distributor company number must be shown.

If a registrant has a potential distributor who does not have a company number assigned, she/he should have the distributor apply, on letterhead stationery, to the Registration Division to have a number assigned prior to submitting this form to the agency.

This Notice of Supplemental Distribution must be submitted by the basic registrant. The completed form must have the concurrence and signature of both the registrant and the distributor.

EPA Registration Number of Product	Distributor Company Number
72265-1	61311

Note: Do not submit distributor product labels

Name of Registered Product *(basic product name accepted by EPA)*	Distributor Product Name
Frontiersman Bear Attack Deterrent	Bear Pepper Mace

Name and Address of Distributor *(Type; include ZIP code)*

Mace Security International, Inc.
160 Benmont Ave. - Ste. 1
Bennington, VT 05201-1893

Read All Conditions Before Signing

1. The distributor product must have the same composition as the basic product.
2. The distributor product must be manufactured and packaged by the same person who manufactures and packages the registered basic product.
3. The labeling for the distributor product must bear the same claims as the basic product, provided, however, that specific claims may be deleted if by doing so, no other changes to the label are necessary.
4. The product must remain in the manufacturer's unbroken container.
5. The label must bear the EPA registration number of the basic product, followed by a hyphen and the distributor's company number.
6. Distributor product labels must bear the name and address of the distributor qualified by such terms as "packed for...","distributed by..."; or "sold by..." to show that the name is not that of the manufacturer.
7. All conditions of the basic registration apply equally to distributor products. It is the responsibility of the basic registrant to see that all distributor labeling is kept in compliance with requirements placed on the basic product.

Distributor

We intend to market our product under the Distributor Product Name specified above, subject to the conditions specified on this Notice.

Signature and Title of Distributor	Date
Div. Vice President	10/08/03

Registrant

I agree that the distributor named above may distribute and sell the Distributor Product specified above, subject to the conditions specified on this Notice.

Signature and Title of Registrant	Date
Robert Name V.P. of Operations	10/10/03

EPA Form 8570-5 (Rev. 8-94) Previous editions are obsolete. White - EPA

*U.S. GPO: 1998-432-472/81004

Oct. 9. 2003 7:26AM 802 442 3823 No.7251 P. 2/2

55836-2

Please Read All Instructions Before Completing this Form *(Form must be typed)* Form Approved. OMB No. 2070-0044. Approval Expires 1-31-95

United States
Environmental Protection Agency
Office of Pesticide Programs (7505C)
Washington, DC 20460

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Div. Vice President	10/08/03

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Signature and Title of Registrant	Date
Robert Name V.P. of Operations	10/10/03

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*U.S. GPO: 1998-432-472/61004

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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

320 5-746115
10

November 12, 2003
Fax 636-343-1318

300 5-748708
10

Security Equipment Corporation
330 Sun Valley Circle
Fenton, Mo 63026

Attention: Mr. Larry Nance

Subject **Frontiersman Bear Attack Deterrent**
EPA Reg. No. 72265-1
Your amended applications of March 10 and August 5, 2003
Our letter of July 7, 2003
Your two letters of September 3, 2003
Request to Increase the Percentage of Active Ingredient, Switch to a more Concentrated Source of Active, Add an 8oz Can Size

Purpose The purpose of your submission, under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), is to amend your registration for this product

1) to increase the percentage of active ingredient from 1.4% to 2.0%,

2) to switch to a more concentrated source of active, and

3) to add a new **8oz** can to your current **9.2oz** can.

Review of amendment We have screened the materials submitted with the above submissions and talked to the chemist. Before we are able to review this application, you need to submit the following data and materials.

Review of amendment-continued

I. Forms

A. Data Matrix Form or List of Data Supporting the Amendment

B. See Comment below (IIA1).

II. Data

A. Chemistry Data (formulated product)

1. I showed your new Confidential Statement of Formula (CSF) of August 28, 2003, to our chemist. He noted these two items:

a. Block 9, Flash Point/Flame Extension

Did you run a test? Is 18 feet the value obtained? Please clarify. Once you have rerun tests on the physical and chemical properties outlined below, you will need to resubmit your CSF with any changes in the form.

b. Block 8, pH

Because of the large change in this value **(from 7.14 to 4.0)**, you will need to provide data on all Physical and Chemistry properties for the new 2.0% formula (except storage stability and corrosion characteristics) prior to approval. **You will need to submit these data in the correct format (PR Notice 86-5).**

2. As indicated in our July 7, 2003, letter, fifteen (15) months after approval, you will need to submit storage stability (830.6317) and corrosion characteristics data (830.6320) on your new formula. **You will need to submit these data in the correct format (PR Notice 86-5).**

B. Chemistry Data (new source product)

Because you have a new source of active ingredient, you would need to submit basic chemistry data on the new source, including five analyses of the source for the percentage of active ingredient. **You will need to submit these data in the correct format (PR Notice 86-5).**

Review of amendment-continued

C. Acute Toxicity Data (formulated product)

1. Eye Irritation Test
2. Skin Irritation Test

We need these tests, which were mentioned in our July 7, 2003, letter because:

a. you are increasing the percentage of active ingredient in the formula by 43%, which could increase the irritation of the product requiring a change in the precautionary labeling to protect users and.

b. You are reducing the ph of your product to "4", which could affect the results of these tests.

You will need to submit these data in the correct format (PR Notice 86-5).

D. Effectiveness Data

You will need to submit these data (8.0 and 9.2 oz sizes) in the correct format (PR Notice 86-5).

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,

DBP

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

Letter location

Disk 130:A:\Capsaicin\72265-1, amended application of 8-5-2003, 2 ltr of 9-3-2003.wpd, 11-12-2003

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

DANGER: May cause irreversible eye damage if sprayed directly in the eyes at close range. Contact through touching or rubbing the eye may cause moderate eye irritation. Avoid contact with skin or clothing. Wash thoroughly with soap and water after handling.

First Aid

Have label with you when obtaining treatment advice. Call a poison control center, doctor, or 1-800-535-5035 immediately for treatment advice.
IF ON SKIN OR CLOTHING – Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes.
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.

Physical or Chemical Hazards

Flammable. Contents under pressure. Keep away from heat, sparks and open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

Environmental Hazards

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

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 that are attacking or appear likely to attack humans. This product may not be effective in all situations or prevent all injuries. Do not spray this product on objects, tents or humans; such use has no deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. 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 that may have become contaminated with this product.

This product has an effective range of 30 Feet.
The canister empties in approximately 5 seconds.

Fig. 1

Fig. 2

Fig. 3

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 below and familiarize yourself with these procedures. If you have not used this product before, you should obtain a training can and practice with it until you can perform these activities quickly and accurately. If you test-fire this container, make sure the wind is at your back and depress the actuator tab for no more than half a second. Do not test-fire in areas inhabited by bears. After test firing, clean nozzle and can with soap and water to remove residue from the can.

To Arm and Apply: This product is designed for one-handed operation. Place forefinger through hole in handle with thumb on orange safety clip curl. Pull safety clip straight back and off using thumb (Fig. 1). Depress actuator tab for burst of spray (Fig. 2).

Aim at face and eyes of bear. Press trigger for 3 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

To Disarm: Replace safety clip by firmly pushing with thumb until audible "snap" is heard (Fig. 3). Check to see if safety clip is securely in place. No gap should be visible between the actuator handle and the safety clip.

Storage and Disposal

Storage: Store in a cool, dry place inaccessible to children and pets. Do not store in places where the temperature may exceed 120°F. Disposal: When container is empty, press valve to release all pressure. Replace safety clip, wrap container and discard in trash. Do not incinerate or puncture.

FRONTIERSMAN®

BEAR ATTACK DETERRENT

To Deter Bears From Attacking Humans

For Use When Hunting, Camping, Fishing, Hiking and Biking or whenever enjoying the great outdoors.

ACTIVE INGREDIENTS:

Capsaicin and related capsaicinoids*	2.0%
INERT INGREDIENTS	98.0%
TOTAL	100.0%

*Includes 1.14% Capsaicinoids and 0.86% other Capsaicinoids derived from Oleoresin of Capsicum

DO NOT SEEK OUT ENCOUNTERS WITH BEARS. THIS PRODUCT IS A BEAR ATTACK REPELLENT THAT MAY PROTECT USERS IN SOME UNEXPECTED CONFRONTATIONS WITH BEARS BUT MAY NOT BE EFFECTIVE IN ALL SITUATIONS OR PREVENT ALL INJURIES. READ THIS ENTIRE LABEL BEFORE TAKING THIS PRODUCT INTO AREAS WHERE BEARS MIGHT BE ENCOUNTERED.

KEEP OUT OF REACH OF CHILDREN

DANGER

Strong temporary irritant to eyes, nose and skin.
Wash thoroughly with soap and water after handling.

See Back Panel for Additional Precautions

EPA Reg. No. 72265-1 EPA Est. 72265-MO-1

NET CONTENTS: 7.9 OZ

Manufactured by: Security Equipment Corporation
330 Sun Valley Circle, Fenton, MO 63026 • (800) 325-9568
info@sabre-sabrered.com • www.sabre-sabrered.com

Made in the U.S.A.

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

DANGER: May cause irreversible eye damage if sprayed directly in the eyes at close range. Contact through touching or rubbing the eye may cause moderate eye irritation. Avoid contact with skin or clothing. Wash thoroughly with soap and water after handling.

First Aid

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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.

Physical or Chemical Hazards

Flammable. Contents under pressure. Keep away from heat, sparks and open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

Environmental Hazards

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

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 that are attacking or appear likely to attack humans. This product may not be effective in all situations or prevent all injuries. Do not spray this product on objects, tents or humans; such use has no deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. 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 that may have become contaminated with this product.

This product has an effective range of 35 Feet.
The canister empties in approximately 5.5 Seconds.

Fig. 1

Fig. 2

Fig. 3

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 below and familiarize yourself with these procedures. If you have not used this product before, you should obtain a training can and practice with it until you can perform these activities quickly and accurately. If you test-fire this container, make sure the wind is at your back and depress the actuator tab for no more than half a second. Do not test-fire in areas inhabited by bears. After test firing, clean nozzle and can with soap and water to remove residue from the can.

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Storage and Disposal

Storage: Store in a cool, dry place inaccessible to children and pets. Do not store in places where the temperature may exceed 120°F. Disposal: When container is empty, press valve to release all pressure. Replace safety clip, wrap container and discard in trash. Do not incinerate or puncture.

FRONTIERSMAN®

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KEEP OUT OF REACH OF CHILDREN

DANGER

Strong temporary irritant to eyes, nose and skin.
Wash thoroughly with soap and water after handling.

See Back Panel for Additional Precautions

EPA Reg. No. 72265-1 EPA Est. 72265-MO-1

NET CONTENTS: 9.2 OZ.

Manufactured by: Security Equipment Corporation
330 Sun Valley Circle, Fenton, MO 63026 • (800) 325-9568
info@sabre-sabrered.com • www.sabre-sabrered.com

Made in the U.S.A.

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

DANGER: May cause irreversible eye damage if sprayed directly in the eyes at close range. Contact through touching or rubbing the eye may cause moderate eye irritation. Avoid contact with skin or clothing. Wash thoroughly with soap and water after handling.

First Aid

Have label with you when obtaining treatment advice. Call a poison control center, doctor, or 1-800-535-5035 immediately for treatment advice.
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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.

Physical or Chemical Hazards

Flammable. Contents under pressure. Keep away from heat, sparks and open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

Environmental Hazards

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

DIRECTIONS FOR USE

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Storage and Disposal

Storage: Store in a cool, dry place inaccessible to children and pets. Do not store in places where the temperature may exceed 120°F. Disposal: When container is empty, press valve to release all pressure. Replace safety clip, wrap container and discard in trash. Do not incinerate or puncture.

FRONTIERSMAN.

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EPA Reg. No. 72265-1 EPA Est. 72265-MO-1

NET CONTENTS: 9.2 OZ.

Manufactured by: Security Equipment Corporation
330 Sun Valley Circle, Fenton, MO 63026 • (800) 325-9568
info@sabre-sabrered.com • www.sabre-sabrered.com

Made in the U.S.A.

PRECAUTIONARY STATEMENTS

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Physical or Chemical Hazards

Flammable. Contents under pressure. Keep away from heat, sparks and open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

Environmental Hazards

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

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INERT INGREDIENTS	98.0%
TOTAL	100.0%

*Includes 1.14% Capsaicinoids and 0.86% other Capsaicinoids derived from Oleoresin of Capsicum

DO NOT SEEK OUT ENCOUNTERS WITH BEARS. THIS PRODUCT IS A BEAR ATTACK REPELLENT THAT MAY PROTECT USERS IN SOME UNEXPECTED CONFRONTATIONS WITH BEARS BUT MAY NOT BE EFFECTIVE IN ALL SITUATIONS OR PREVENT ALL INJURIES. READ THIS ENTIRE LABEL BEFORE TAKING THIS PRODUCT INTO AREAS WHERE BEARS MIGHT BE ENCOUNTERED.

KEEP OUT OF REACH OF CHILDREN

DANGER

Strong temporary irritant to eyes, nose and skin.
Wash thoroughly with soap and water after handling.

See Back Panel for Additional Precautions

EPA Reg. No. 72265-1 EPA Est. 72265-MO-1

NET CONTENTS: 9.2 OZ.

Manufactured by: Security Equipment Corporation
330 Sun Valley Circle, Fenton, MO 63026 • (800) 325-9568
info@sabre-sabrered.com • www.sabre-sabrered.com

Made in the U.S.A.

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

DANGER: May cause irreversible eye damage if sprayed directly in the eyes at close range. Contact through touching or rubbing the eye may cause moderate eye irritation. Avoid contact with skin or clothing. Wash thoroughly with soap and water after handling.

First Aid

Have label with you when obtaining treatment advice. Call a poison control center, doctor, or 1-800-535-5035 immediately for treatment advice.
IF ON SKIN OR CLOTHING – Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes.
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.

Physical or Chemical Hazards

Flammable. Contents under pressure. Keep away from heat, sparks and open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

Environmental Hazards

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

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 that are attacking or appear likely to attack humans. This product may not be effective in all situations or prevent all injuries. Do not spray this product on objects, tents or humans; such use has no deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. 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 that may have become contaminated with this product.

This product has an effective range of 30 Feet.
The canister empties in approximately 5 seconds.

Fig. 1

Fig. 2

Fig. 3

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 below and familiarize yourself with these procedures. If you have not used this product before, you should obtain a training can and practice with it until you can perform these activities quickly and accurately. If you test-fire this container, make sure the wind is at your back and depress the actuator tab for no more than half a second. Do not test-fire in areas inhabited by bears. After test firing, clean nozzle and can with soap and water to remove residue from the can.

To Arm and Apply: This product is designed for one-handed operation. Place forefinger through hole in handle with thumb on orange safety clip curl. Pull safety clip straight back and off using thumb (Fig. 1). Depress actuator tab for burst of spray (Fig. 2).

Aim at face and eyes of bear. Press trigger for 3 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

To Disarm: Replace safety clip by firmly pushing with thumb until audible "snap" is heard (Fig. 3). Check to see if safety clip is securely in place. No gap should be visible between the actuator handle and the safety clip.

Storage and Disposal

Storage: Store in a cool, dry place inaccessible to children and pets. Do not store in places where the temperature may exceed 120°F. Disposal: When container is empty, press valve to release all pressure. Replace safety clip, wrap container and discard in trash. Do not incinerate or puncture.

FRONTIERSMAN®

BEAR ATTACK DETERRENT

To Deter Bears From Attacking Humans

For Use When Hunting, Camping, Fishing, Hiking and Biking or whenever enjoying the great outdoors.

ACTIVE INGREDIENTS:

Capsaicin and related capsaicinoids*	2.0%
INERT INGREDIENTS	98.0%
TOTAL	100.0%

*Includes 1.14% Capsaicinoids and 0.86% other Capsaicinoids derived from Oleoresin of Capsicum

DO NOT SEEK OUT ENCOUNTERS WITH BEARS. THIS PRODUCT IS A BEAR ATTACK REPELLENT THAT MAY PROTECT USERS IN SOME UNEXPECTED CONFRONTATIONS WITH BEARS BUT MAY NOT BE EFFECTIVE IN ALL SITUATIONS OR PREVENT ALL INJURIES. READ THIS ENTIRE LABEL BEFORE TAKING THIS PRODUCT INTO AREAS WHERE BEARS MIGHT BE ENCOUNTERED.

KEEP OUT OF REACH OF CHILDREN

DANGER

Strong temporary irritant to eyes, nose and skin.
Wash thoroughly with soap and water after handling.

See Back Panel for Additional Precautions

EPA Reg. No. 72265-1 EPA Est. 72265-MO-1

NET CONTENTS: 7.9 OZ

Manufactured by: Security Equipment Corporation
330 Sun Valley Circle, Fenton, MO 63026 • (800) 325-9568
info@sabre-sabrered.com • www.sabre-sabrered.com

Made in the U.S.A.

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

DANGER: May cause irreversible eye damage if sprayed directly in the eyes at close range. Contact through touching or rubbing the eye may cause moderate eye irritation. Avoid contact with skin or clothing. Wash thoroughly with soap and water after handling.

First Aid

Have label with you when obtaining treatment advice. Call a poison control center, doctor, or 1-800-535-5035 immediately for treatment advice.
IF ON SKIN OR CLOTHING – Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes.
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.

Physical or Chemical Hazards

Flammable. Contents under pressure. Keep away from heat, sparks and open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

Environmental Hazards

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

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 that are attacking or appear likely to attack humans. This product may not be effective in all situations or prevent all injuries. Do not spray this product on objects, tents or humans; such use has no deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. 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 that may have become contaminated with this product.

This product has an effective range of 30 Feet.
The canister empties in approximately 5 seconds.

Fig. 1

Fig. 2

Fig. 3

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 below and familiarize yourself with these procedures. If you have not used this product before, you should obtain a training can and practice with it until you can perform these activities quickly and accurately. If you test-fire this container, make sure the wind is at your back and depress the actuator tab for no more than half a second. Do not test-fire in areas inhabited by bears. After test firing, clean nozzle and can with soap and water to remove residue from the can.

To Arm and Apply: This product is designed for one-handed operation. Place forefinger through hole in handle with thumb on orange safety clip curl. Pull safety clip straight back and off using thumb (Fig. 1). Depress actuator tab for burst of spray (Fig. 2).

Aim at face and eyes of bear. Press trigger for 3 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

To Disarm: Replace safety clip by firmly pushing with thumb until audible "snap" is heard (Fig. 3). Check to see if safety clip is securely in place. No gap should be visible between the actuator handle and the safety clip.

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Storage: Store in a cool, dry place inaccessible to children and pets. Do not store in places where the temperature may exceed 120°F. Disposal: When container is empty, press valve to release all pressure. Replace safety clip, wrap container and discard in trash. Do not incinerate or puncture.

FRONTIERSMAN®

BEAR ATTACK DETERRENT

To Deter Bears From Attacking Humans

For Use When Hunting, Camping, Fishing, Hiking and Biking or whenever enjoying the great outdoors.

ACTIVE INGREDIENTS:

Capsaicin and related capsaicinoids*	2.0%
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KEEP OUT OF REACH OF CHILDREN

DANGER

Strong temporary irritant to eyes, nose and skin.
Wash thoroughly with soap and water after handling.

See Back Panel for Additional Precautions

EPA Reg. No. 72265-1 EPA Est. 72265-MO-1

NET CONTENTS: 7.9 OZ

Manufactured by: Security Equipment Corporation
330 Sun Valley Circle, Fenton, MO 63026 • (800) 325-9568
info@sabre-sabrered.com • www.sabre-sabrered.com

Made in the U.S.A.

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

September 12, 2003

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

LARRY D. NANCE
SECURITY EQUIPMENT CORPORATION
330 SUN VALLEY CIRCLE
FENTON, MO 63026

PRODUCT NAME: FRONTIERSMAN BEAR ATTACK DETERRENT
COMPANY NAME: SECURITY EQUIPMENT CORPORATION
EPA FILE SYMBOL: 72265-1
EPA RECEIPT DATE: 09/11/03

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Registration Division, Risk Management Team 4, at (703) 308-7038.

Sincerely,

Patricia L. Morse
Front End Processing Staff
Information Services Branch
Information Resources and Services Division

SECURITY
EQUIPMENT CORPORATION

September 3, 2003

Dan Peacock
Environmental Protection Agency
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

Mr. Peacock:

I am sending the enclosed documentation in response to your letter dated July 7, 2003 regarding the amended application of March 10, 2003 of the Frontiersman Bear Attack Deterrent. I have divided the information based on your three categorizations of the data requested.

Section I - Forms include:

1. Revised CSF for the Frontiersman Bear Attack Deterrent formulation.
2. CSF for the active ingredient.

Section II - Data includes:
This portion of the letter requires the citation of FRONTIERSMAN Bear Attack Deterrent's previous chemistry data, found under EPA Registration Number 72265-1. The CSF identifies the same ingredients used in FRONTIERSMAN'S existing registration. We have increased the amount of propellant in order to attain a greater distance in spray pattern.

1. Five batch analysis's of the [redacted] active ingredient. For clarification, [redacted] is the manufacturer of the active ingredient. [redacted] is their United States distributor.
2. Eye and Skin irritation tests and HPLC batch analysis of the raw material.
3. Spray pattern test including CD Rom with video.

Section III – Labeling includes:

1. Three labels for the 9.2 oz FRONTIERSMAN Bear Attack Deterrent.
2. Three labels for the 7.9 oz. canister. They have been modified to show the 2.0% active and the new spray pattern distances and times.

Thank you for your consideration.

Sincerely,

Robert Nance
V. P. of Operations

330 Sun Valley Circle
Fenton, MO 63026

(636) 343-0200
(800) 325-9568
(636) 343-1318 Fax

E-Mail: info@sabre-sabrered.com
http://www.sabre-sabrered.com

Product ingredient source information may be entitled to confidential treatment

SECURITY
EQUIPMENT CORPORATION

September 3, 2003

Dan Peacock
Environmental Protection Agency
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

Mr. Peacock:

I am sending the enclosed documentation as supporting data for the amendment of my current FRONTIERSMAN Bear Attack Deterrent. As the enclosed amendment form states, I would like to increase the distance of my shot pattern from 18 to 25 feet, to 35 feet. I have included a revised CSF which identifies the increase of propellant to [redacted] of the formulation. This modification to my existing formulation has significantly increased the effective range of the product.

I have enclosed the following data in support of the amendment.

1. Revised CSF for the Frontiersman Bear Attack Deterrent formulation.
2. Spray pattern test including CD Rom with video.
3. Three labels for the 9.2 oz FRONTIERSMAN Bear Attack Deterrent.

This amendment is in addition to the amendment dated March 10, 2003. Thank you for your consideration.

Sincerely,

Robert Nance
V. P. of Operations

Manufacturing process information may be entitled to confidential treatment

330 Sun Valley Circle
Fenton, MO 63026

(636) 343-0200
(800) 325-9568
(636) 343-1318 Fax

E-Mail: info@sabre-sabrered.com
http://www.sabre-sabrered.com

Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060. Approval expires 2-28-95

EPA

United States
Environmental Protection Agency
Washington, DC 20460

- [ ] Registration
- [x] Amendment
- [ ] Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number Security Equipment Corporation/72265-1	2. EPA Product Manager Dan Peacock	3. Proposed Classification [x] None [ ] Restricted
4. Company/Product (Name) Security Equipment Corp/Frontiersman Bear Attack Deterrent	PM#	
5. Name and Address of Applicant *(Include ZIP Code)* Security Equipment Corporation 330 Sun Valley Circle Fenton, MO 63026 [ ] *Check if this is a new address*	6. **Expedited Reveiw.** In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. 72265-1 Product Name Frontiersman Bear Attack Deterrent	

Section - II

- [x] Amendment - Explain below.
- [ ] Resubmission in response to Agency letter dated _____
- [ ] Notification - Explain below.
- [ ] Final printed labels in repsonse to Agency letter dated _____
- [ ] "Me Too" Application.
- [ ] Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

We would like to amend the effective range on the Frontiersman 9.2 oz. label from 18 to 25 feet, to 35 feet. We would also like to amend the firing time from 5 seconds to 5.5 seconds. A Shot pattern study has been completed and will be submitted with this amendment.

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging	Unit Packaging	Water Soluble Packaging	2. Type of Container
[ ] Yes [x] No	[ ] Yes [x] No	[ ] Yes [x] No	[x] Metal [ ] Plastic [ ] Glass [ ] Paper [ ] Other (Specify) _____
* Certification must be submitted	If "Yes" Unit Packaging wgt. / No. per container	If "Yes" Package wgt / No. per container	

3. Location of Net Contents Information	4. Size(s) Retail Container	5. Location of Label Directions
[x] Label [ ] Container	9.2 fl. oz.	[x] On Label

6. Manner in Which Label is Affixed to Product
- [x] Lithograph
- [x] Paper glued
- [ ] Stenciled
- [ ] Other _____

Section - IV

1. Contact Point *(Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)*

Name	Title	Telephone No. (Include Area Code)
Larry Nance	President	636-343-0200

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowlingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

6. Date Application Received (Stamped)

2. Signature Larry Nance	3. Title President
4. Typed Name Larry Nance	5. Date 8/05/03

EPA Form 8570-1 (Rev. 3-94) Previous editions are obsolete. White - EPA File Copy (original) Yellow - Applicant Copy

Paperwork Reduction Act Notice and Instructions

Paperwork Reduction Act Notice: Public reporting burden for this collection of information is estimated to average 0.85 hour per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to Chief, Information Policy Branch, (2136), U.S. Environmental Protection Agency, 401 M Street, SW, Washington, D.C. 20460.

Instructions: This form is to be used for all applications for new registration, end use reregistration, amendment, resubmission, to applications for notifications, final printed labeling, reregistration, etc. In order to process an application for a new registration submitted on this form, the following material must accompany the application:

1. Certification with Respect to Citation of Data (EPA Form 8570-29). [If not exempted by 40 CFR 152.81 (b) (4)];
2. Confidential Statement of Formula (EPA Form 8570-4);
3. Formulator's Exemption Statement (EPA Form 8570-27);
4. Five copies of draft labeling;
5. Three copies of any data submitted;
6. Authorization letter where applicable;
7. Matrices where applicable.

Submission of Labeling - Labeling should first be submitted in the form of draft labels with all applications for new registration. Such draft labels may be in the form of typed label text on 8.5 x 11 inch file. Mockup labels significantly smaller than 8.5 x 11 inches should be mounted on 8.5 x 11 inch paper for submission.

Submission of Data - Data submitted in support of this application must be submitted in accordance with PR Notice 86-5.

Specific Instructions: Please read the instructions listed below before completing this application. First determine the type of registration action, listed in Block A, for which you are submitting this application. For applications submitted in connection with New Registration actions, Sections I, III, and IV must be completed by the applicant. For applications submitted in connection with amended reregistration actions, resubmissions, notifications, reregistrations, etc., Sections I, II, and IV must be completed by the applicant.
Block A - Check the appropriate action for which you are submitting this form.

Section I - This section must be completed, as applicable, for all registration actions.

1. Company/Product Number - Insert your Company Number, if one has been assigned by EPA. This number may have been assigned to you as a basic registrant, a distributor, or as an establishment. If your product is registered, insert the Product Number.
2. EPA Product Manager - If known, fill in the name and PM number of the EPA Product Manager.
3. Proposed Classification - Specify the proposed classification of this product.
4. Product Name - Enter the complete product name of this pesticide as it will appear on the label. The name must be specific to this product only. Duplication of names is not permitted among products of the same company. Do not include any brand name or company line designations.
5. Name and Address of Applicant - The name of the firm or person and address shown in your application is the person or firm to whom the registration will be issued. If you are acting in behalf of another party, you must submit authorization from the party to act for them in registration matters. An applicant not residing in the United States must have an authorized agent residing in the United States to act for them in all registration matters. The name and complete mailing address of such an agent must accompany this application.
6. Expedited Review - FIFRA section 3(c) 3(b) provides for expedited review of applications for registration, or amendments to existing registrations, that are similar, or identical to other pesticide products that are currently registered with the EPA. In order for you application to be eligible for expedited review, you must provide us with the EPA Registration Number and product name of the product you believe is similar to or identical to your product. The product must be similar or identical in both formulation and labeled uses.

Section II - This section must be completed for all applications submitted to amend the registration only of a currently registered product (Amendment), for a resubmission in response to an Agency letter, for notifications to the Agency, for the submission of final printed labeling, for reregistration and for any other action that pertains to a specific EPA-registered product. This section is not to be used for a new application for registration.

1. Subject of submission - Check the applicable block and provide the Agency letter date if appropriate. Provide a brief explanation of the purpose(s) for the submission, such as "the addition of a site, pest or crop (specify)"; "amend the Confidential Statement of Formula by . . . "; "reregistration submission"; "general label revision of use directions." Attach a separate page is additional space is needed.

Section III (Packaging and Container Information) - This Section must be completed for all applications submitted in connection with new registration or applicable amendments.

1. Type of Packaging - Check the appropriate block if your product will be packaged in the indicated packaging types. Indicate the size of the individual packets and number per retail container.
2. Type of Retail Container - Indicate type of container in which product will be marketed.
3. Location of Net Contents - Indicate the location of the net contents information for your product.
4. Size(s) of Retail Container - Specify the net contents of all retail containers for your product.
5. Location of the Use Directions - Indicate the location of the use directions for your product.
6. Manner in which label is affixed to product - Indicated the method product label is attached to retail container.

Section IV (Contact Point) - This Section must be completed for all applications for Registration actions, i.e., new products registration, resubmission, "me-too," reregistration, etc.

1-5. Self-explanatory
6. EPA Use only

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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

July 7, 2003 742014 300/10

Security Equipment Corporation
330 Sun Valley Circle
Fenton, Mo 63026

Attention: Mr. Larry Nance

Subject **Frontiersman Bear Attack Deterrent**
EPA Reg. No. 72265-1
Your amended application of March 10, 2003
Request to Increase the Percentage of Active Ingredient, Switch to a more Concentrated Source of Active, Add an 8oz Can Size

Purpose The purpose of your submission, under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), is to amend your registration for this product 1) to increase the percentage of active ingredient from 1.4% to 2.0%, 2) to switch to a more concentrated source of active, and 3) to add a new **8oz** can to your current **9.2oz** can.

Review of amendment We will be able to process this request as an amendment to the existing registration, not as an application for a new product. To have a complete amended application that we can review to support these two changes to your registration, you will need to submit the following forms, data, and labeling:

Need new 2nd jacket

Review of amendment-continued

I. Forms

A. Confidential Statement of Formula (CSF), EPA Form 8570-4

1. Given the amount of your new source being put in your product, according to your March 10, 2002, CSF, the % active in your source should be double the value shown on the form.

2. Alternatively, if the % active in your source is correct, then you need to add twice the amount of it as currently shown on your CSF.

3. Submit a revised CSF with the correct values for the % active in the source and the % of that source used in your proposed formula.

4. You will need to submit a separate CSF for your source of active ingredient

B. Data Matrix or List of Data Supporting the Amendment

II. Data

A. Chemistry Data (formulated product)

1. If the only change in the chemistry of the **formulated product** is the addition of a new, more concentrated source of active ingredient and resulting changes to the percentages of other ingredients, then simply cite the previous chemistry data. Fifteen (15) months after approval, you will need to submit storage stability (830.6317) and corrosion characteristics data (830.6320) on your new formula.

2. We note that you submitted a Certificate of Analysis for the product and a flammability test.

Review of amendment-continued

3. As indicated above you will need to submit a revised CSF for product as sold and a separate CSF for your new source of active ingredient.

4. Finally, you will need to submit basic chemistry data on your new source, as outlined below.

B. Chemistry Data (new source product)

Because you have a new source of active ingredient, you would need to submit basic chemistry data on the new source, including five analyses of the source for the percentage of active ingredient. See enclosure.

C. Acute Toxicity Data

1. Eye Irritation Test
2. Skin Irritation Test

We need these tests because you are increasing the percentage of active ingredient in the formula by 43%, which could increase the irritation of the product requiring a change in the precautionary labeling to protect users.

D. Effectiveness Data

For each can size, you will need to repeat your spray pattern test and obtain data on:

A. the height and width of the pattern at regular intervals from the point of discharge
B. the average number of 1 second bursts from a single can and
C. the average total spray time if can emptied at one time.

Before beginning additional effectiveness tests, refer to your previous data submit to the Agency and our comments on those data.

Review of amendment-continued

III. Labeling

A. We need three (3) copies of all labeling for this product, including can label, inserts, and brochures. You have already submitted the can label. However, you need to submit any other labeling sold with this product.

B. If you put your website on your labeling, we will have to review it before allowing it on your labeling.

C. After we receive a complete application and review the materials requested in this letter, we will have additional labeling comments.

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,

DBP

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

Enclosure

Chemistry Data Requirements for New Source

Letter location

Disk 110:A:\Capsaicin\72265-1, amendment to increase % active and add 8 oz can,6-30-2003.wpd

Jacket Data For New Source of Capsaicin 72265-1

The minimum product chemistry data required to register a product with the Agency are described in 40CFR§158.150 to 158.190 and the OPPTS Guidelines Series 830 Subgroups A & B. The following table lists the data requirements:

Group A: Product Identity, Composition, and Analysis				
Guide No.	Title	Test substance		
		TGAI	MP	EP
830.1550	Product identity and composition	Yes	Yes	Yes
830.1600	Description of materials used to produce the product	Yes	Yes	Yes
830.1620	Description of production process	Yes	Yes	No
830.1650	Description of formulation process	No	No	Yes
830.1670	Discussion of formation of impurities	Yes	Yes	Yes
830.1700	Preliminary analysis (5 batch analysis)	Yes	Yes	No*
830.1750	Certified limits	Yes	Yes	Yes
830.1800	Enforcement analytical method	Yes	Yes	Yes
830.1900	Submittal of samples	Yes	Case-by-case	Case-by-case

* Preliminary analysis(5 batch analysis) for the active ingredient is required if the end-use product is produced by an integrated system.

provided by Daniel B. Peacock, 2003

Group B: Physical and Chemical Properties				
Guide No.	Title	Test substance		
		TGAI	MP	EP
830.6302	Color	Yes	Yes	No
830.6303	Physical state	Yes	Yes	Yes
830.6304	Odor	Yes	Yes	No
830.6313	Stability to normal and elevated temperature, metals, and metal ions N/A	Yes	No	No
830.6314	Oxidation/reduction: chemical incompatibility N/A	No	Yes	Yes
830.6315	Flammability	No	Yes	Yes
830.6316	Explodability	No	Yes	Yes
830.6317	Storage stability run test on end-use product due 15 mos. after approval	No	Yes	Yes
830.6319	Miscibility	No	Yes	Yes
830.6320	Corrosion characteristics run test on end-use product due 15 mos. after approval	No	Yes	Yes
830.6321	Dielectric breakdown voltage	No	No	Yes
830.7000	pH	Yes	Yes	Yes
830.7050	UV/visible absorption	Yes	No	No
830.7100	Viscosity	No	Yes	Yes
830.7200	Melting point/melting range N/A	Yes	No	No
830.7220	Boiling point/boiling range	Yes	No	No

Group B: Physical and Chemical Properties				
Guide No.	Title	Test substance		
		TGAI	MP	EP
830.7300	Density/relative density/bulk density	Yes	Yes	Yes
830.7370	Dissociation constant in water	Yes	No	No
830.7520	Particle size, fiber length, and diameter distribution	Yes	No	No
830.7550	Partition coefficient (n-octanol/water), shake flask method	Yes	No	No
830.7560	Partition coefficient (n-octanol/water, generator column method	Yes	No	No
830.7570	Partition coefficient (n-octanol/water), estimation by liquid chromatography	Yes	No	No
830.7840	Water solubility: column elution method; shake flask method	Yes	No	No
830.7850	Water solubility: generator column method	Yes	No	No
830.7950	Vapor pressure	Yes	No	No

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

DANGER: May cause irreversible eye damage if sprayed directly in the eyes at close range. Contact through touching or rubbing the eye may cause moderate eye irritation. Avoid contact with skin or clothing. Wash thoroughly with soap and water after handling.

First Aid

Have label with you when obtaining treatment advice. Call a poison control center, doctor, or 1-800-535-5035 immediately for treatment advice.
IF ON SKIN OR CLOTHING – Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes.
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.

Physical or Chemical Hazards

Flammable. Contents under pressure. Keep away from heat, sparks and open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

Environmental Hazards

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

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 that are attacking or appear likely to attack humans. This product may not be effective in all situations or prevent all injuries. Do not spray this product on objects, tents or humans; such use has no deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. 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 that may have become contaminated with this product.

This product has an effective range of 18-25 feet.
The canister empties in approximately 5 **seconds.**

Fig. 1

Fig. 2

Fig. 3

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 below and familiarize yourself with these procedures. If you have not used this product before, you should obtain a training can and practice with it until you can perform these activities quickly and accurately. If you test-fire this container, make sure the wind is at your back and depress the actuator tab for no more than half a second. Do not test-fire in areas inhabited by bears. After test firing, clean nozzle and can with soap and water to remove residue from the can.

To Arm and Apply: This product is designed for one-handed operation. Place forefinger through hole in handle with thumb on orange safety clip curl. Pull safety clip straight back and off using thumb (Fig. 1). Depress actuator tab for burst of spray (Fig. 2).

Aim at face and eyes of bear. Press trigger for 3 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

To Disarm: Replace safety clip by firmly pushing with thumb until audible "snap" is heard (Fig. 3). Check to see if safety clip is securely in place. No gap should be visible between the actuator handle and the safety clip.

Storage and Disposal

Storage: Store in a cool, dry place inaccessible to children and pets. Do not store in places where the temperature may exceed 120°F. Disposal: When container is empty, press valve to release all pressure. Replace safety clip, wrap container and discard in trash. Do not incinerate or puncture.

FRONTIERSMAN®

BEAR ATTACK DETERRENT

To Deter Bears From Attacking Humans

For Use When Hunting, Camping, Fishing, Hiking and Biking or whenever enjoying the great outdoors.

ACTIVE INGREDIENTS:

Capsaicin and related capsaicinoids*	2.0%
INERT INGREDIENTS	98.0%
TOTAL	100.0%

*Includes 1.14% Capsaicinoids and 0.86% other Capsaicinoids derived from Oleoresin of Capsicum

DO NOT SEEK OUT ENCOUNTERS WITH BEARS. THIS PRODUCT IS A BEAR ATTACK REPELLENT THAT MAY PROTECT USERS IN SOME UNEXPECTED CONFRONTATIONS WITH BEARS BUT MAY NOT BE EFFECTIVE IN ALL SITUATIONS OR PREVENT ALL INJURIES. READ THIS ENTIRE LABEL BEFORE TAKING THIS PRODUCT INTO AREAS WHERE BEARS MIGHT BE ENCOUNTERED.

KEEP OUT OF REACH OF CHILDREN

DANGER

Strong temporary irritant to eyes, nose and skin.
Wash thoroughly with soap and water after handling.

See Back Panel for Additional Precautions

EPA Reg. No. 72265-1 EPA Est. 72265-MO-1

NET CONTENTS: 8.0 oz

Manufactured by: Security Equipment Corporation
330 Sun Valley Circle, Fenton, MO 63026 • (800) 325-9568
info@sabre-sabrered.com • www.sabre-sabrered.com

Made in the U.S.A.

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

DANGER: May cause irreversible eye damage if sprayed directly in the eyes at close range. Contact through touching or rubbing the eye may cause moderate eye irritation. Avoid contact with skin or clothing. Wash thoroughly with soap and water after handling.

First Aid

Have label with you when obtaining treatment advice. Call a poison control center, doctor, or 1-800-535-5035 immediately for treatment advice.
IF ON SKIN OR CLOTHING – Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes.
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.

Physical or Chemical Hazards

Flammable. Contents under pressure. Keep away from heat, sparks and open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

Environmental Hazards

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

DIRECTIONS FOR USE

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USE RESTRICTIONS: This product may be used only to deter bears that are attacking or appear likely to attack humans. This product may not be effective in all situations or prevent all injuries. Do not spray this product on objects, tents or humans; such use has no deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. 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 that may have become contaminated with this product.

This product has an effective range of 13-25 feet.
The canister empties in approximately 5 seconds.

Fig. 1

Fig. 2

Fig. 3

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To Arm and Apply: This product is designed for one-handed operation. Place forefinger through hole in handle with thumb on orange safety clip curl. Pull safety clip straight back and off using thumb (Fig. 1). Depress actuator tab for burst of spray (Fig. 2).

Aim at face and eyes of bear. Press trigger for 3 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

To Disarm: Replace safety clip by firmly pushing with thumb until audible "snap" is heard (Fig. 3). Check to see if safety clip is securely in place. No gap should be visible between the actuator handle and the safety clip.

Storage and Disposal

Storage: Store in a cool, dry place inaccessible to children and pets. Do not store in places where the temperature may exceed 120°F. Disposal: When container is empty, press valve to release all pressure. Replace safety clip, wrap container and discard in trash. Do not incinerate or puncture.

FRONTIERSMAN®

BEAR ATTACK DETERRENT

To Deter Bears From Attacking Humans

For Use When Hunting, Camping, Fishing, Hiking and Biking or whenever enjoying the great outdoors.

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Capsaicin and related capsaicinoids*	2.0%
INERT INGREDIENTS	98.0%
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KEEP OUT OF REACH OF CHILDREN

DANGER

Strong temporary irritant to eyes, nose and skin.
Wash thoroughly with soap and water after handling.

See Back Panel for Additional Precautions

EPA Reg. No. 72265-1 EPA Est. 72265-MO-1

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Hazards to Humans & Domestic Animals

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First Aid

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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.

Physical or Chemical Hazards

Flammable. Contents under pressure. Keep away from heat, sparks and open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

Environmental Hazards

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

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This product has an effective range of 18-25 feet.
The canister empties in approximately 5 seconds.

Fig. 1

Fig. 2

Fig. 3

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Storage and Disposal

Storage: Store in a cool, dry place inaccessible to children and pets. Do not store in places where the temperature may exceed 120°F. Disposal: When container is empty, press valve to release all pressure. Replace safety clip, wrap container and discard in trash. Do not incinerate or puncture.

FRONTIERSMAN®

BEAR ATTACK DETERRENT

To Deter Bears From Attacking Humans

For Use When Hunting, Camping, Fishing, Hiking and Biking or whenever enjoying the great outdoors.

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INERT INGREDIENTS	98.0%
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KEEP OUT OF REACH OF CHILDREN

DANGER

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Wash thoroughly with soap and water after handling.

See Back Panel for Additional Precautions

EPA Reg. No. 72265-1 EPA Est. 72265-MO-1

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PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

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Physical or Chemical Hazards

Flammable. Contents under pressure. Keep away from heat, sparks and open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

Environmental Hazards

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

DIRECTIONS FOR USE

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Fig. 1

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To Arm and Apply: This product is designed for one-handed operation. Place forefinger through hole in handle with thumb on orange safety clip curl. Pull safety clip straight back and off using thumb (Fig. 1). Depress actuator tab for burst of spray (Fig. 2).

Aim at face and eyes of bear. Press trigger for 3 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

To Disarm: Replace safety clip by firmly pushing with thumb until audible "snap" is heard (Fig. 3). Check to see if safety clip is securely in place. No gap should be visible between the actuator handle and the safety clip.

Storage and Disposal

Storage: Store in a cool, dry place inaccessible to children and pets. Do not store in places where the temperature may exceed 120°F. Disposal: When container is empty, press valve to release all pressure. Replace safety clip, wrap container and discard in trash. Do not incinerate or puncture.

FRONTIERSMAN®

BEAR ATTACK DETERRENT

To Deter Bears From Attacking Humans

For Use When Hunting, Camping, Fishing, Hiking and Biking or whenever enjoying the great outdoors.

ACTIVE INGREDIENTS:

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INERT INGREDIENTS	98.0%
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KEEP OUT OF REACH OF CHILDREN

DANGER

Strong temporary irritant to eyes, nose and skin.
Wash thoroughly with soap and water after handling.

See Back Panel for Additional Precautions

EPA Reg. No. 72265-1 EPA Est. 72265-MO-1

NET CONTENTS: 9.2 OZ.

Manufactured by: Security Equipment Corporation
330 Sun Valley Circle, Fenton, MO 63026 • (800) 325-9568
info@sabre-sabered.com • www.sabre-sabered.com

Made in the U.S.A.

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

DANGER: May cause irreversible eye damage if sprayed directly in the eyes at close range. Contact through touching or rubbing the eye may cause moderate eye irritation. Avoid contact with skin or clothing. Wash thoroughly with soap and water after handling.

First Aid

Have label with you when obtaining treatment advice. Call a poison control center, doctor, or 1-800-535-5035 immediately for treatment advice.
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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.

Physical or Chemical Hazards

Flammable. Contents under pressure. Keep away from heat, sparks and open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

Environmental Hazards

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

DIRECTIONS FOR USE

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Fig. 1

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To Arm and Apply: This product is designed for one-handed operation. Place forefinger through hole in handle with thumb on orange safety clip cut. Pull safety clip straight back and off using thumb (Fig. 1). Depress actuator tab for burst of spray (Fig. 2).

Aim at face and eyes of bear. Press trigger for 3 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

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Storage and Disposal

Storage: Store in a cool, dry place inaccessible to children and pets. Do not store in places where the temperature may exceed 120°F. Disposal: When container is empty, press valve to release all pressure. Replace safety clip, wrap container and discard in trash. Do not incinerate or puncture.

FRONTIERSMAN.

BEAR ATTACK DETERRENT

To Deter Bears From Attacking Humans

For Use When Hunting, Camping, Fishing, Hiking and Biking or whenever enjoying the great outdoors.

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KEEP OUT OF REACH OF CHILDREN

DANGER

Strong temporary irritant to eyes, nose and skin.
Wash thoroughly with soap and water after handling.

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EPA Reg. No. 72265-1 EPA Est. 72265-MO-1

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PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

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Physical or Chemical Hazards

Flammable. Contents under pressure. Keep away from heat, sparks and open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

Environmental Hazards

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Storage and Disposal

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TOTAL	100.0%

*Includes 1.14% Capsaicinoids and 0.86% other Capsaicinoids derived from Oleoresin of Capsicum

DO NOT SEEK OUT ENCOUNTERS WITH BEARS. THIS PRODUCT IS A BEAR ATTACK REPELLENT THAT MAY PROTECT USERS IN SOME UNEXPECTED CONFRONTATIONS WITH BEARS BUT MAY NOT BE EFFECTIVE IN ALL SITUATIONS OR PREVENT ALL INJURIES. READ THIS ENTIRE LABEL BEFORE TAKING THIS PRODUCT INTO AREAS WHERE BEARS MIGHT BE ENCOUNTERED.

KEEP OUT OF REACH OF CHILDREN

DANGER

Strong temporary irritant to eyes, nose and skin.
Wash thoroughly with soap and water after handling.

See Back Panel for Additional Precautions

EPA Reg. No. 72265-1 EPA Est. 72265-MO-1

NET CONTENTS: 9.2 OZ.

Manufactured by: Security Equipment Corporation
330 Sun Valley Circle, Fenton, MO 63026 • (800) 325-9568
info@sabre-sabrered.com • www.sabre-sabrered.com

Made in the U.S.A.

Pages 136-137 Manufacturing process information may be entitled to confidential treatment

Discuss 3.31

SECURITY
EQUIPMENT CORPORATION

March 10, 2003

Dan Peacock
Environmental Protection Agency
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

Mr. Peacock:

Security Equipment Corporation would like to amend its current percentage of active ingredient in the Frontiersman Bear Attack Deterrent, EPA Registration Number 72265-1. We would like to increase the capsaicinoids from 1.4% to 2.0%. In order to complete this change, I have included the following documents:

EPA Form 8570-1, Application for Pesticide Amendment (2 copies)
EPA Form 8570-4, Confidential Statement of Formula (2 copies)
Revised Frontiersman product label (5 copies)
Product Chemistry (2 copies)

Security Equipment Corporation would also like to add a second size canister of Frontiersman Bear Attack Deterrent, EPA Registration Number 72265-1. We would like to introduce a 225 gram (8.0 ounce) canister. This product would contain the same formulation of our larger canister. I have included the following documents:

EPA Form 8570-1, Application for Pesticide Amendment (2 copies)
Revised Frontiersman product label (5 copies)

Thank you for your time and consideration. Please let me know if you have any questions.

Sincerely,

Robert Nance
V. P. of Operations

Enclosure
EPA Form 8570-1 (2)
EPA Form 8570-4 (2)
Revised Frontiersman Bear Attack Deterrent Label (5)
Product Chemistry (2)

EPA Form 8570-1 (2)
Revised Frontiersman Bear Attack Deterrent Label (5)

330 Sun Valley Circle
Fenton, MO 63026

(636) 343-0200
(800) 325-9568
(636) 343-1318 Fax

E-Mail: info@sabre-sabrered.com
http://www.sabre-sabrered.com

Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060. Approval expires 2-28-95

EPA

United States
Environmental Protection Agency
Washington, DC 20460

- [ ] Registration
- [x] Amendment
- [ ] Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number Security Equipment Corporation/72265-1	2. EPA Product Manager Dan Peacock	3. Proposed Classification [x] None [ ] Restricted
4. Company/Product (Name) Security Equipment Corp/Frontiersman Bear Attack Deterrent	PM#	
5. Name and Address of Applicant *(Include ZIP Code)* Security Equipment Corporation 330 Sun Valley Circle Fenton, MO 63026 [ ] *Check if this is a new address*	6. **Expedited Reveiw.** In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. 72265-1 Product Name Frontiersman Bear Attack Deterrent	

Section - II

- [x] Amendment - Explain below.
- [ ] Resubmission in response to Agency letter dated _____
- [ ] Notification - Explain below.
- [ ] Final printed labels in repsonse to Agency letter dated _____
- [ ] "Me Too" Application.
- [ ] Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

We would like to amend the confidential statement of formulation by increasing the capsaicinoids in the Frontiersman Bear Attack Deterrent from 1.4% to 2.0% . This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA."

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging	Unit Packaging	Water Soluble Packaging	2. Type of Container
[ ] Yes [x] No	[ ] Yes [x] No	[ ] Yes [x] No	[x] Metal [ ] Plastic [ ] Glass [ ] Paper [ ] Other (Specify) _____
Certification must be submitted	If "Yes" Unit Packaging wgt. / No. per container	If "Yes" Package wgt / No. per container	

3. Location of Net Contents Information	4. Size(s) Retail Container	5. Location of Label Directions
[x] Label [ ] Container	9.2 fl. oz.	[x] On Label

6. Manner in Which Label is Affixed to Product: [x] Lithograph [x] Paper glued [ ] Stenciled [ ] Other _____

Section - IV

1. Contact Point *(Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)*

Name	Title	Telephone No. (Include Area Code)
Larry Nance	President	636-343-0200

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowlingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

6. Date Application Received (Stamped)

2. Signature Larry J. Nance	3. Title President
4. Typed Name Larry Nance	5. Date 3/10/03

Paperwork Reduction Act Notice and Instructions

Paperwork Reduction Act Notice: Public reporting burden for this collection of information is estimated to average 0.85 hour per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to Chief, Information Policy Branch, (2136), U.S. Environmental Protection Agency, 401 M Street, SW, Washington, D.C. 20460.

Instructions: This form is to be used for all applications for new registration, end use reregistration, amendment, resubmission, to applications for notifications, final printed labeling, reregistration, etc. In order to process an application for a new registration submitted on this form, the following material must accompany the application:

1. Certification with Respect to Citation of Data (EPA Form 8570-29). [If not exempted by 40 CFR 152.81 (b) (4)];
2. Confidential Statement of Formula (EPA Form 8570-4);
3. Formulator's Exemption Statement (EPA Form 8570-27);
4. Five copies of draft labeling;
5. Three copies of any data submitted;
6. Authorization letter where applicable;
7. Matrices where applicable.

Submission of Labeling - Labeling should first be submitted in the form of draft labels with all applications for new registration. Such draft labels may be in the form of typed label text on 8.5 x 11 inch file. Mockup labels significantly smaller than 8.5 x 11 inches should be mounted on 8.5 x 11 inch paper for submission.

Submission of Data - Data submitted in support of this application must be submitted in accordance with PR Notice 86-5.

Specific Instructions: Please read the instructions listed below before completing this application. First determine the type of registration action, listed in Block A, for which you are submitting this application. For applications submitted in connection with New Registration actions, Sections I, III, and IV must be completed by the applicant. For applications submitted in connection with amended reregistration actions, resubmissions, notifications, reregistrations, etc., Sections I, II, and IV must be completed by the applicant.
Block A - Check the appropriate action for which you are submitting this form.

Section I - This section must be completed, as applicable, for all registration actions.

1. Company/Product Number - Insert your Company Number, if one has been assigned by EPA. This number may have been assigned to you as a basic registrant, a distributor, or as an establishment. If your product is registered, insert the Product Number.
2. EPA Product Manager - If known, fill in the name and PM number of the EPA Product Manager.
3. Proposed Classification - Specify the proposed classification of this product.
4. Product Name - Enter the complete product name of this pesticide as it will appear on the label. The name must be specific to this product only. Duplication of names is not permitted among products of the same company. Do not include any brand name or company line designations.
5. Name and Address of Applicant - The name of the firm or person and address shown in your application is the person or firm to whom the registration will be issued. If you are acting in behalf of another party, you must submit authorization from the party to act for them in registration matters. An applicant not residing in the United States must have an authorized agent residing in the United States to act for them in all registration matters. The name and complete mailing address of such an agent must accompany this application.
6. Expedited Review - FIFRA section 3(c) 3(b) provides for expedited review of applications for registration, or amendments to existing registrations, that are similar, or identical to other pesticide products that are currently registered with the EPA. In order for you application to be eligible for expedited review, you must provide us with the EPA Registration Number and product name of the product you believe is similar to or identical to your product. The product must be similar or identical in both formulation and labeled uses.

Section II - This section must be completed for all applications submitted to amend the registration only of a currently registered product (Amendment), for a resubmission in response to an Agency letter, for notifications to the Agency, for the submission of final printed labeling, for reregistration and for any other action that pertains to a specific EPA-registered product. This section is not to be used for a new application for registration.

1. Subject of submission - Check the applicable block and provide the Agency letter date if appropriate. Provide a brief explanation of the purpose(s) for the submission, such as "the addition of a site, pest or crop (specify)"; "amend the Confidential Statement of Formula by . . . "; "reregistration submission"; "general label revision of use directions." Attach a separate page is additional space is needed.

Section III (Packaging and Container Information) - This Section must be completed for all applications submitted in connection with new registration or applicable amendments.

1. Type of Packaging - Check the appropriate block if your product will be packaged in the indicated packaging types. Indicate the size of the individual packets and number per retail container.
2. Type of Retail Container - Indicate type of container in which product will be marketed.
3. Location of Net Contents - Indicate the location of the net contents information for your product.
4. Size(s) of Retail Container - Specify the net contents of all retail containers for your product.
5. Location of the Use Directions - Indicate the location of the use directions for your product.
6. Manner in which label is affixed to product - Indicated the method product label is attached to retail container.

Section IV (Contact Point) - This Section must be completed for all applications for Registration actions, i.e., new products registration, resubmission, "me-too," reregistration, etc.

1-5. Self-explanatory
6. EPA Use only

29A 7-1

Please Read All Instructions Before Completing this Form *(Form must be typed)* Form Approved. OMB No. 2070-0044. Approval Expires 1-31-95

Reactivate

289054

United States
Environmental Protection Agency
Office of Pesticide Programs (7505C)
Washington, DC 20460

Notice of Supplemental Distribution of a Registered Pesticide Product

Instructions

After a registrant has obtained final registration for the basic product, the registrant may then supplementally distribute his/her product. One form must be submitted for each distributor product and must be signed by the distributor involved. The basic registration number and the distributor company number must be shown.

If a registrant has a potential distributor who does not have a company number assigned, she/he should have the distributor apply, on letterhead stationery, to the Registration Division to have a number assigned prior to submitting this form to the agency.

This Notice of Supplemental Distribution must be submitted by the basic registrant. The completed form must have the concurrence and signature of both the registrant and the distributor.

EPA Registration Number of Product	Distributor Company Number
2 72265-1 8	73144 8

Note: Do not submit distributor product labels

Name of Registered Product *(basic product name accepted by EPA)*	Distributor Product Name
FrontiersmanBearAtt ack Deterrant	Alaska Backpacker

Name and Address of Distributor (Type; include ZIP code)
V.F. Grace,I nc.
605E. 13th
Anchorage,AK99501

Read All Conditions Before Signing

1. The distributor product must have the same composition as the basic product.
2. The distributor product must be manufactured and packaged by the same person who manufactures and packages the registered basic product.
3. The labeling for the distributor product must bear the same claims as the basic product, provided, however, that specific claims may be deleted if by doing so, no other changes to the label are necessary.
4. The product must remain in the manufacturer's unbroken container.
5. The label must bear the EPA registration number of the basic product, followed by a hyphen and the distributor's company number.
6. Distributor product labels must bear the name and address of the distributor qualified by such terms as "packed for...","distributed by..."; or "sold by..." to show that the name is not that of the manufacturer.
7. All conditions of the basic registration apply equally to distributor products. It is the responsibility of the basic registrant to see that all distributor labeling is kept in compliance with requirements placed on the basic product.

Distributor

We intend to market our product under the Distributor Product Name specified above, subject to the conditions specified on this Notice.

Signature and Title of Distributor: Richard N. Folz — Sporting Goods Manager, V.F. Grace Inc.
Date: 3/17/03

Registrant

I agree that the distributor named above may distribute and sell the Distributor Product specified above, subject to the conditions specified on this Notice.

Signature and Title of Registrant: President, Security Equipment
Date: 3/21/03

EPA Form 8570-5 (Rev. 8-94) Previous editions are obsolete.

3-24-2003

White - EPA

SECURITY
EQUIPMENT CORPORATION

(File)

72265-1

08·09·02

EPA

8-27-2002

354/38 5-620755

July 8, 2002

Dan Peacock
Environmental Protection Agency
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

Mr. Peacock:

Enclosed you will find a proof for a new Frontiersman Bear Attack label and a sample Sabre Red Law Enforcement Label. Security Equipment Corporation currently places the Sabre Red label on our law enforcement pepper sprays. We created the label with a white box at the bottom in which we print an expiration date, a lot number and a batch number. The Sabre Red label has a sample of each of these printed in the white box.

I would like to remove the following lines from the front panel of the current Frontiersman label:

Expiration Date: Not for sale or use after 1/1/2005
Then follow DISPOSAL text

I would like to print an expiration date, lot number and batch number on the white box at the bottom of the Frontiersman label proof, just as it appears on the Sabre Red label.

By allowing us to print expiration dates directly on the label as the product is manufactured, we can purchase our labels in larger quantities, which constitutes a cheaper price. In the past we have tried to order a large quantity of labels with valid expiration dates, but usually we do not sell enough in the time frame and we destroy the labels and waste money. Therefore, I would like to improve this product by adding the most current expiration date to each batch we produce and reduce our label expense. Please let me know if this label change can be approved.

Thank you for your time and consideration. Please let me know if you have any questions.

Sincerely,

Robert A

Robert Nance
V. P. of Operations

Enclosure
Frontiersman Bear Attack Deterrent Label Proof
Sabre Red Label
Frontiersman Label

We have no objection to moving the text on the expiration date, lot #, and ~~lot~~ batch #.
If he wants a stamped label, send 3 copies.
JBPeacock
8-27-2002
12:35 PM

330 Sun Valley Circle
Fenton, MO 63026

(636) 343-0200
(800) 325-9568
(636) 343-1318 Fax

E-Mail: info@sabre-sabrered.com
http://www.sabre-sabrered.com

ENTERPRISE
LABEL COMPANY, INC.
1465 Hoelzer Ct. • Pacific, MO 63069 • 636-271-2600 • Fax 636-271-2601

03-09-02

EPA

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

DANGER: May cause irreversible eye damage if sprayed directly in the eyes at close range. Contact through touching or rubbing the eye may cause moderate eye irritation. Avoid contact with skin or clothing. Wash thoroughly with soap and water after handling.

First Aid

Have label with you when obtaining treatment advice. Call a poison control center, doctor, or 1-800-535-5035 immediately for treatment advice.
IF ON SKIN OR CLOTHING – Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes.
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.

Physical or Chemical Hazards

Flammable. Contents under pressure. Keep away from heat, sparks and open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

Environmental Hazards

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

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 that are attacking or appear likely to attack humans. This product may not be effective in all situations or prevent all injuries. Do not spray this product on objects, tents or humans; such use has no deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. 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 that may have become contaminated with this product.

This product has an effective range of 18 to 25 feet.
The canister empties in approximately 5 seconds.

Fig. 1

Fig. 2

Fig. 3

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 below and familiarize yourself with these procedures. If you have not used this product before, you should obtain a training can and practice with it until you can perform these activities quickly and accurately. If you test-fire this container, make sure the wind is at your back and depress the actuator tab for no more than half a second. Do not test-fire in areas inhabited by bears. After test firing, clean nozzle and can with soap and water to remove residue from the can.

To Arm and Apply: This product is designed for one-handed operation. Place forefinger through hole in handle with thumb on orange safety clip curl. Pull safety clip straight back and off using thumb (Fig. 1). Depress actuator tab for burst of spray (Fig. 2).

Aim at face and eyes of bear. Press trigger for 3 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

To Disarm: Replace safety clip by firmly pushing with thumb until audible "snap" is heard (Fig. 3). Check to see if safety clip is securely in place. No gap should be visible between the actuator handle and the safety clip.

Storage and Disposal

Storage: Store in a cool, dry place inaccessible to children and pets. Do not store in places where the temperature may exceed 120°F. Disposal: When container is empty, press valve to release all pressure. Replace safety clip, wrap container and discard in trash. Do not incinerate or puncture.

FRONTIERSMAN®

BEAR ATTACK DETERRENT

To Deter Bears From Attacking Humans

For Use When Hunting, Camping, Fishing, Hiking and Biking or whenever enjoying the great outdoors.

ACTIVE INGREDIENTS:

Capsaicin and related capsaicinoids*	1.4%
INERT INGREDIENTS	98.6%
TOTAL	100.0%

*Includes 0.9% Capsaicin and 0.5% other Capsaicinoids derived from Oleoresin of Capsicum

DO NOT SEEK OUT ENCOUNTERS WITH BEARS. THIS PRODUCT IS A BEAR ATTACK REPELLENT THAT MAY PROTECT USERS IN SOME UNEXPECTED CONFRONTATIONS WITH BEARS BUT MAY NOT BE EFFECTIVE IN ALL SITUATIONS OR PREVENT ALL INJURIES. READ THIS ENTIRE LABEL BEFORE TAKING THIS PRODUCT INTO AREAS WHERE BEARS MIGHT BE ENCOUNTERED.

KEEP OUT OF REACH OF CHILDREN

DANGER

Strong temporary irritant to eyes, nose and skin.
Wash thoroughly with soap and water after handling.

See Back Panel for Additional Precautions

EPA Reg. No. 72265-1 EPA Est. 72265-MO-1

NET CONTENTS: 9.2 OZ.

Manufactured by: Security Equipment Corporation
330 Sun Valley Circle, Fenton, MO 63026 • (800) 325-9568
info@sabre-sabrered.com • www.sabre-sabrered.com

Made in the U.S.A.

19753 Security Equipment PMS 485 Black Die

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

August 5, 2002

Security Equipment Corp.
330 Sun Valley Circle
Fenton, MO 63036

305/38 5-613145

Attention: Mr. Larry D. Nance

Subject Frontiersman Bear Attack Deterrent
EPA Reg. No. 72265-1
Your letters of March 7 and May 22, 2002
Replacement of Safety Clip and Revision of Label
Submission of Two Studies

In the letter dated March 7, 2002, you requested 1) to replace your orange safety clip with a "glow-in-the-dark" safety clip and 2) to delete the word "orange" from two sentences of your label text.

Review of new clip The proposed "glow-in-the-dark" safety clip" is acceptable. The clips that we received glowed in the dark after a short period of exposure to fluorescent lighting. We did not attempt to determine the length of time over which the clips would continue to glow.

Revised label The two deletions of the word, "orange" are acceptable. Submit three (3) copies of revised labeling. You will have 18 months to use up existing stocks of previously accepted labeling.

EPA contact

We also received a letter dated May 22, 2002, including studies (flash and freezing points) to support this registration. If you want us to review them, you need to submit them in the correct format (PR Notice 86-5) and provide more information about how such studies would support this product. For example, based on these studies, would you want to make a label claim or do you wish to include them as part of the product chemistry data for this product? Had you submitted these studies previously?

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

Sincerely,

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

Letter location

A:\Capsaicin\72265-1, 8-5-2002, change in safety clip, label, studies on freezing and flash point,wpd.wpdAugust 5, 2002

IRB BRANCH REVIEW - TSS

Record Number(s)

D282033

4/1/02m 7/2/02

IN ____ OUT ____

EFFICACY

FILE OR REG. NO. 72265-1

PETITION OR EXP. PERMIT NO.

DATE DIV. RECEIVED 3/26/02

DATE OF SUBMISSION ~~Mx~~ 3/7/02

DATE SUBMISSION ACCEPTED 4/1/02

TYPE PRODUCTS(S): I, D, H, F, N, Rx S

DATA ACCESSION NO(S). no new efficacy data

PRODUCT MGR. NO. 04

PRODUCT NAME(S) FRONTIERSMAN BEAR ATTACK DETERRENT

COMPANY NAME Security Equipment Corporation

SUBMISSION PURPOSE change clips and alter labels slightly

CHEMICAL & FORMULATION 1/4% Capsaicin and related capsaicinoids" aerosol

Please forward to Dan Peacock & IRB

Thank you

WWJ

Efficacy Review: FRONTIERSMAN BEAR ATTACK DETERRENT, 72265-1
Security Equipment Corporation
Fenton, MO 63026

200.0 INTRODUCTION

200.1 Uses

A 1.4% "Capsaicin and related capsaicinoids" aerosol product Federally registered for use at unspecified sites

only to deter bears which are attacking or appear likely to attack humans.

The accepted labels declare this product to be nominally 0.9% Capsaicin and 0.5% "other Capsaicinoids derived from Oleoresin of Capsicum".

200.2 Background Information

See efficacy reviews of 6/30/99, 11/9/99, 11/30/99, 1/21/00, 3/29/00, 5/31/00, 7/11/00, and 8/20/01, along with the enforcement-case efficacy reviews of 2/7/00 and 3/15/00 which pertained primarily to unregistered products produced by Security. 72265-1 was Federally registered on 7/17/00. The labels accepted on that date remain current.

This review addresses a submission of 3/7/02 which consists of a letter from Robert Nance, Security's "V.P. of Operations", plus a pouch containing two chartreuse safety clips which are to be used to prevent accidental firing of the product's aerosol canisters.

201.0 DATA SUMMARY

In his letter of 3/7/01, Robert Nance describes the intent of the submission in the paragraphs quoted below.

> We would like to remove the word "orange" from the To Disarm section on the labels [sic] back panel. Instead, we would like the sentence to read "Replace safety clip by firmly pushing with thumb until audible snap is heard (Fig.3)."
>
> Also, we would like to replace the orange safety clip on our current unit, with the glow in the dark safety clips enclosed.

The safety clips do glow in the dark after only minimal exposure to ambient fluorescent room lighting. How long into a night on the trail the glow might last is not established, but Security neither has nor proposes a label claim regarding the glowing of the clips.

The proposed dilution of the word "orange" is needed because the glow-in-the-dark clips are not orange. The word "orange" also must be deleted from the second sentence of the **"To Arm and Apply:"** paragraph. There really is no need to indicate the color of the safety clip as each canister sold will have its own clip of whatever color it happens to be. The orange clips show up well in daylight but not at night. The chartreuse clips show up by day and will glow, for a while at least, at night.

The materials sent for my review did not include proposed revised labels.

202.0 CONCLUSIONS

1. The proposed use of glow-in-the-dark safety clips is acceptable. The clips that we received glowed in the dark after a short period of exposure to fluorescent lighting. We did not attempt to determine the length of time over which the clips would continue to glow.

2. The proposed deletion of the word "orange" from the first sentence of the **"To Disarm:"** paragraph is appropriate and acceptable. The same change also is needed in the second sentence of the **"To Arm and Apply:"** paragraph.

3. Submit proposed revised labels which reflect the changes noted in the previous paragraph.

William W. Jacobs
Biologist
Insecticide-Rodenticide Branch
July 7, 2002

Send to ⟹ Bill Jacobs

Bill

DP BARCODE: D282033

CASE: 064803
SUBMISSION: S613145

DATA PACKAGE RECORD
BEAN SHEET

DATE: 04/01/02

* * * CASE/SUBMISSION INFORMATION * * *

CASE TYPE: REGISTRATION ACTION: 305 TECH-LBL REV AMND DATA RE
RANKING : 10 POINTS ()
CHEMICALS: 070701 Capsaicin (in oleoresin of capsicum) 1.3880%

ID#: 072265-00001 Frontiersman Bear Attack Deterrent
COMPANY: 072265 SECURITY EQUIPMENT CORPORATION
PRODUCT MANAGER: 04 TINA LEVINE 703-308-7055 ROOM: CM2 219
PM TEAM REVIEWER: DANIEL PEACOCK 703-305-5407 ROOM: CM2 221
RECEIVED DATE: 03/26/02 DUE OUT DATE: 09/22/02

* * * DATA PACKAGE INFORMATION * * *

DP BARCODE: 282033 EXPEDITE: N DATE SENT: 04/01/02 DATE RET.: / /
CHEMICAL: 070701 Capsaicin (in oleoresin of capsicum)
DP TYPE: 001
CSF: N LABEL: N

ASSIGNED TO	DATE IN	DATE OUT	ADMIN DUE DATE: 08/19/02
DIV : RD	/ /	/ /	NEGOT DATE: / /
BRAN: IRB	/ /	/ /	PROJ DATE: / /
SECT: PM04	/ /	/ /	
REVR : [illegible]	4/1/02	7/2/02 RL	
CONTR:	/ /	/ /	

* * * DATA REVIEW INSTRUCTIONS * * *

Bill,

Co has submitted new, glow in the dark, safety clips and associated labeling changes. Please review and pass on the acceptability of these changes.

Thank You,

Dan Peacock

* * * DATA PACKAGE EVALUATION * * *

No evaluation is written for this data package

* * * ADDITIONAL DATA PACKAGES FOR THIS SUBMISSION * * *

DP BC	BRANCH/SECTION	DATE OUT	DUE BACK	INS	CSF	LABEL

SECURITY
EQUIPMENT CORPORATION

March 7, 2002

Dan Peacock
Office of Pesticide Registration
U.S. Environmental Protection Agency
Room 266A Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

Dan:

This letter is to request an amendment to Security Equipment Corporation's Frontiersman Bear Attack Deterrent label, EPA Registration Number 72265-1.

We would like to remove the word "orange" from the To Disarm section on the labels back panel. Instead, we would like the sentence to read "Replace safety clip by firmly pushing with thumb until audible snap is heard (Fig.3)."

Also, we would like to replace the orange safety clip on our current unit, with the glow in the dark safety clips enclosed.

I look forward to your reply.

Sincerely,

Robert Nance
V. P. of Operations

received 3-26-2002

Enclosure
Glow in the dark safety clip (2)

330 Sun Valley Circle
Fenton, MO 63026

(636) 343-0200
(800) 325-9568
(636) 343-1318 Fax

E-Mail: info@sabre-sabrered.com
http://www.sabre-sabrered.com

File

305
38

S-616485

Tel. conversation
Purpose of submission:
He doesn't know, but he will call me back & let me know what if anything this submission pertains to.
DBPeacock
1200 mgm
5/30/2002

SECURITY
EQUIPMENT CORPORATION

May 22, 2002
Document Processing Desk – Appl
U.S. ENVIROMENTAL PROTECTION AGENCY
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington VA 22202

ATTENTION: Dan Peacock, Insecticide/Rodenticide Branch

Dear Mr. Peacock,

SUBJECT: Security Equipment Corporation
330 Sun Valley Circle
Fenton, Missouri 63026-4690
EPA Registration Number: 72265-1

The following Studies are in support of our Registration:

1. Measurement of the Freezing Point of Frontiersman® Bear Attack Deterrent
2. Determination of Flash Point of Frontiersman® Bear Attack Deterrent

If you have any questions please call me at 636-343-0200 or email me at lnance@sabre-sabrered.com.

Regards,

Larry D. Nance

Larry D. Nance
President

05.24.02
EPA

330 Sun Valley Circle
Fenton, MO 63026

(636) 343-0200
(800) 325-9568
(636) 343-1318 Fax

E-Mail: info@sabre-sabrered.com
http://www.sabre-sabrered.com

SECURITY
EQUIPMENT CORPORATION

May 22,2002

Document Processing Desk – APPL
Office of Pesticide Programs – 7505C
U.S. ENVIROMENTAL PROTECTION AGENCY
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

ATTENTION: Dan Peacock, Insecticide/Rodenticide Branch

Study Title: Determination of Flash Point of Frontiersman ® Bear Attack Deterrent

Company: Security Equipment Corporation
330 Sun Valley Circle
Fenton, Missouri 63026-4690

Product Identification: Frontiersman® Bear Attack Deterrent
EPA Registration Number: 72265-1

Data Requirement: Support for EPA Registration Number: 72265-1

Author: Larry Nance

Completion Date: April 24,2002

Name of Laboratory Performing Study: SMI
12219 SW 131 Avenue
Miami, Florida 33166-2401

Laboratory Project Number: SMI/REF: 02MAR601

Prepared By: Security Equipment Corporation
330 Sun Valley Circle
Fenton, Missouri 63026-4690

330 Sun Valley Circle
Fenton, MO 63026

(636) 343-0200
(800) 325-9568
(636) 343-1318 Fax

E-Mail: info@sabre-sabrered.com
http://www.sabre-sabrered.com

Quality control process information may be entitled to confidential treatment

SECURITY
EQUIPMENT CORPORATION

May 22, 2002

Document Processing Desk – APPL
Office of Pesticide Programs – 7505C
U.S. ENVIROMENTAL PROTECTION AGENGY
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

ATTENTION: Dan Peacock, Insecticide/Rodenticide Branch

Study Title: Measurement of the freezing point of Frontiersman® Frontiersman Bear Attack Deterrent

Company Name: Security Equipment Corporation
330 Sun Valley Circle
Fenton, Missouri 63026-4690

Product Identification: Frontiersman Bear Attack Deterent
EPA Registration Number: 72265-1

Data Requirement: Support for EPA Registration Number: 72265-1.

Author: Larry Nance

Completion Date: April 26,2002

Name of the Laboratory Performing Study: Chemir /Polytech Laboratories Inc.
2672 Metro Blvd.
Maryland Heights Missouri 63043

Laboratory Project Number: 520970

Prepared By: Security Equipment Corporation
330 Sun Valley Circle
Fenton, Missouri 63026-4690

330 Sun Valley Circle
Fenton, MO 63026

(636) 343-0200
(800) 325-9568
(636) 343-1318 Fax

E-Mail: info@sabre-sabrered.com
http://www.sabre-sabrered.com

Pages 155-156 Quality control process information may be entitled to confidential treatment

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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

December 4, 2001

Security Equipment Corporation
330 Sun Valley Circle
Fenton, MO 63026

Attention: Mr. Larry D. Nance

Subject: Frontiersman Bear Attack Deterrent
EPA Reg. No. 72265-01
Your submission to satisfy the data requirements for Storage Stability and Corrosion Characteristics dated June 26, 2001.

Background: The Agency has reviewed the 12-month Corrosion and Stability study (MRID # 454415-01) for Storage Stability and Corrosion Characteristics for your product Frontiersman Bear Attack Deterrent.

Storage stability is adequate for one year under the storage conditions tested and no significant change in concentration was observed throughout the duration of the study.

Conclusion: The data submitted are acceptable and satisfy the data requirements found in the guidelines.

EPA Contact: If you have any questions or comments about this letter, please contact me at 703-605-0716 (by phone), 703-305-6596 (by fax), or mccann.geri@epa.gov (by E-Mail).

Sincerely yours,

Geraldine R. McCann
Insecticide-Rodenticide Branch
Registration Division (7505C)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

OPPTS/OPP/RD/TRB/PRODUCT CHEMISTRY TEAM

WASHINGTON, D.C. 20460

DATE: 28/SEP/2001

SUBJECT: **PRODUCT CHEMISTRY REVIEW OF MP [ ] EP [X]**
DP BARCODE No.: D277076
REG./File Symbol No.: 72265-1
PRODUCT NAME: Frontiersman Bear Attack Deterrent
COMPANY: Security Equipment Corporation

FROM: Linda L. Kutney, Chemist
Product Chemistry Team
Technical Review Branch/RD (7505C)

Linda L Kutney
9/28/01

TO: Debbie McCall, Geri McCann PM-4
Insecticide-Rodenticide Branch/RD (7505C)

INTRODUCTION

Security Equipment Corporation has submitted corrosion characteristic and storage stability data in support of registration of their product, Frontiersman Bear Attack Deterrent. This product contains a label claim of 1.4% capsaicin and related capsaicinoids, intended as a means of preventing bear attacks.

Corrosion of container and % content testing was initiated on 7/12/99, the 0-month time period, and after 3, 6, and 12 months of storage.

FINDINGS:

- Frontiersman Bear Attack Deterrent was stored at 25 C (23 C to 27 C in ambient humidity), in its original aerosol can, for one year, using Security Equipment Corporation

Analytical Method, SAM 1355. The results of this testing are summarized in the table below.

- No visually observed changes (leakage or corrosion) were seen containers storing Frontiersman Bear Attack Deterrent, following one year storage period.

- Summary of Storage Stability Data for Frontiersman Bear Attack Deterrent:

Sample Date	Length of Storage	ANALYSIS, % CAPSAICIN-OIDS	LABEL CLAIM, % CAPSAICIN-OIDS
7/30/99 9/1,14/99	0 Months	1.414%	1.388% w/w
10/26/99	3 Months	1.280%	1.388% w/w
1/18/00	6 Months	1.339%	1.388% w/w
8/24/00	12 Months	1.391%	1.388% w/w

- The total amounts of Capsaicinoids throughout the one year storage study did not vary significantly from the label claim.

- Initial concentration percentages for Frontiersman Bear Attack Deterrent were very similar to final percentages.

CONCLUSION:

TRB has reviewed this submission and concludes that the corrosion characteristic and storage stability studies support the registration of Frontiersman Bear Attack Deterrent, specifically:

- Storage stability for Frontiersman Bear Attack Deterrent is adequate for 1 year under the storage conditions tested. No significant change in concentration was observed throughout the duration of the study.

- The data submitted are acceptable and satisfy the data requirements of Guideline 830.6317, for storage stability.

- The data requirements of Guideline 830.6320, corrosion characteristics, are satisfied.

SECURITY
EQUIPMENT CORPORATION

454415-00

June 26, 2001

5601874
D277076

Document Processing Desk – APPL
Office of Pesticide Program – 7505C
U.S. ENVIRONMENTAL PROTECTION AGENCY
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

Attention: Dan Peacock, Insecticide/Rodenticide Branch

Dear Mr. Peacock:

SUBJECT: Security Equipment Corporation
Frontiersman® Bear Attack Deterrent
EPA File Registration Number: 72265-1

Security Equipment Corporation is submitting the enclosed material in support of our product's FIFRA pesticide registration.

Enclosed are four copies of our 12 month Corrosion and Stability Study.

Study Title:

454415-01

Container Appearance, Product Appearance, Sample Container Weight Loss, and Total Capsaicinoids Assay Stability Study, Physical Examination(FIFRA).

SPONSOR: Security Equipment Corporation
330 Sun Valley Circle
Fenton, Missouri 63026-4690

TEST SUBSTANCE: Frontiersman Bear Attack Deterrent

AUTHOR (STUDY DIRECTOR): Ray Podolsky
Associate Director of Chemistry, Validation and Quality Services.
Celsis Laboratory Group

TESTING LABORATORY: Celsis Laboratory Group
St. Louis Division
6200 South Lindbergh Blvd.
St. Louis, Missouri 63123

GLP ID NUMBER: 31670

STUDY SPONSOR REPRESENTATIVE: Larry D. Nance

330 Sun Valley Circle
Fenton, MO 63026

(636) 343-0200
(800) 325-9568
(636) 343-1318 Fax

E-Mail: info@sabre-sabrered.com
http://www.sabre-sabrered.com

INDEX OF DOCUMENT ENCLOSED IN THE STUDY.

Page 2. Statement of no Data Confidentiality Claims
Page 3. Good Laboratory Practices Statement
Page 4. Table of Contents
Page 5. Study Initiation and Completion Dates
Page 5. Methods and Materials
Page 7. Summary and Conclusion
Page 8 and Page 9. Table of Study Results
Page 10. Quality Assurance Unit Statement
Page 11-Page 17 Study Protocol
Page 18. Sponsor's Statement
Page 19-119 Raw Data
Page 120-Page 122 Report of Analysis

STUDY COMPLETION DATE: April 10, 2001

STUDY SPONSOR'S REPRESENTATIVE SIGNATURE: Larry D. Nance

Larry D. Nance
President
Security Equipment
Corporation

Hang Tag Label

To Deter Bears From Attacking Humans

For Use When Hunting, Camping, Fishing, Hiking and Biking or whenever enjoying the great outdoors.

ACTIVE INGREDIENTS:
Capsaicin and related capsaicinoids* 1.4%
INERT INGREDIENTS 98.6%
TOTAL 100.0%
*Includes 0.9% Capsaicin and 0.5% other Capsaicinoids derived from Oleoresin of Capsicum

KEEP OUT OF REACH OF CHILDREN

DANGER

Strong temporary irritant to eyes, nose and skin. Wash thoroughly with soap and water after handling.

See Back Panel for Additional Precautions

ACCEPTED with COMMENTS in EPA Letter Dated

JUL 17 2000

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 72265-1

MADE AND PRINTED IN THE USA

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

DANGER: May cause irreversible eye damage if sprayed directly in the eyes at close range. Contact through touching or rubbing the eye may cause moderate eye irritation. Avoid contact with skin or clothing. Wash thoroughly with soap and water after handling.

First Aid

Have label with you when obtaining treatment advice. Call a poison control center, doctor, or 1-800-325-9558 immediately for treatment advice.

IF ON SKIN OR CLOTHING – Take off contaminated clothing. Rinse skin immediately with plenty of water for 15–20 minutes.

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.

Physical or Chemical Hazards

Flamable. Contents under pressure. Keep away from heat, sparks and open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

Environmental Hazards

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

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.
Refer to carrier and insert for complete Directions for Use.

Storage and Disposal

STORAGE: Store in a cool, dry place inaccessible to children and pets. Do not store in places where the temperature may exceed 120°F. DISPOSAL: When container is empty, press valve to release all pressure. Replace safety clip, wrap container and discard in trash. Do not incinerate or puncture.

EPA Reg. No. 72265-1 EPA Est. 72265-MO-1

BAR CODE

SECURITY EQUIPMENT CORPORATION
330 Sun Valley Circle
Fenton, MO 63026

Insert Label

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

DANGER: May cause irreversible eye damage if sprayed directly in the eyes at close range. Contact through touching or rubbing the eye may cause moderate eye irritation. Avoid contact with skin or clothing. Wash thoroughly with soap and water after handling.

First Aid

Have label with you when obtaining treatment advice. Call a poison control center, doctor, or 1-800-325-9568 immediately for treatment advice.

IF ON SKIN OR CLOTHING – Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes.

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.

Physical or Chemical Hazards

Flammable. Contents under pressure. Keep away from heat, sparks and open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

Environmental Hazards

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

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 that are attacking or appear likely to attack humans. This product may not be effective in all situations or prevent all injuries. Do not spray this product on objects, tents or humans; such use has no deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. 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 that may have become contaminated with this product.

This product has an effective range of 18 to 25 feet.
The canister empties in approximately 5 seconds.

Fig. 1

Fig. 2

Fig. 3

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 below and familiarize yourself with these procedures. If you have not used this product before you should obtain a training can and practice with it until you can perform these activities quickly and accurately. If you test-fire this container make sure the wind is at your back and depress the actuator tab for no more than half a second. Do not test-fire in areas inhabited by bears. After test firing, clean nozzle and can with soap and water to remove residue from the can.

To Arm and Apply: This product is designed for one-handed operation. Place forefinger through hole in handle with thumb on orange safety clip curl. Pull safety clip straight back and off using thumb (Fig. 1). Depress actuator tab for burst of spray (Fig. 2).

Aim at face and eyes of bear. Press trigger for 3 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

To Disarm: Replace orange safety clip by firmly pushing with thumb until audible "snap" is heard (Fig. 3). Check to see if safety clip is securely in place. No gap should be visible between the actuator handle and the safety clip.

Storage and Disposal

Storage: Store in a cool, dry place inaccessible to children and pets. Do not store in places where the temperature may exceed 120°F. Disposal: When container is empty, press valve to release all pressure. Replace safety clip, wrap container and discard in trash. Do not incinerate or puncture.

EPA Reg. No. 72265-1 EPA Est. 72265-MO-1
SECURITY EQUIPMENT CORPORATION
330 Sun Valley Circle, Fenton, MO 63026

ACCEPTED
with COMMENTS
in EPA Letter Dated:

JUL 17 2000

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 72265-1

Aerosol Container Label

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

DANGER: May cause irreversible eye damage if sprayed directly in the eyes at close range. Contact through touching or rubbing the eye may cause moderate eye irritation. Avoid contact with skin or clothing. Wash thoroughly with soap and water after handling.

First Aid

Have label with you when obtaining treatment advice. Call a poison control center, doctor, or 1-800-325-9568 immediately for treatment advice.

IF ON SKIN OR CLOTHING – Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes.

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.

Physical or Chemical Hazards

Flammable. Contents under pressure. Keep away from heat, sparks and open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

Environmental Hazards

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

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 that are attacking or appear likely to attack humans. This product may not be effective in all situations or prevent all injuries. Do not spray this product on objects, tents or humans; such use has no deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. 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 that may have become contaminated with this product.

This product has an effective range of 18 to 25 feet.
The canister empties in approximately 5 seconds.

Fig. 1

Fig. 2

Fig. 3

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 below and familiarize yourself with these procedures. If you have not used this product before you should obtain a training can and practice with it until you can perform these activities quickly and accurately. If you test-fire this container make sure the wind is at your back and depress the actuator tab for no more than half a second. Do not test-fire in areas inhabited by bears. After test firing, clean nozzle and can with soap and water to remove residue from the can.

To Arm and Apply: This product is designed for one-handed operation. Place forefinger through hole in handle with thumb on orange safety clip curl. Pull safety clip straight back and off using thumb (Fig. 1). Depress actuator tab for burst of spray (Fig. 2).

Aim at face and eyes of bear. Press trigger for 3 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

To Disarm: Replace orange safety clip by firmly pushing with thumb until audible "snap" is heard (Fig. 3). Check to see if safety clip is securely in place. No gap should be visible between the actuator handle and the safety clip.

Storage and Disposal

Storage: Store in a cool, dry place inaccessible to children and pets. Do not store in places where the temperature may exceed 120°F. Disposal: When container is empty, press valve to release all pressure. Replace safety clip, wrap container and discard in trash. Do not incinerate or puncture.

Expiration Date: 5/0/02. Discard unit after date of expiration.

FRONTIERSMAN.

BEAR ATTACK DETERRENT

To Deter Bears From Attacking Humans

For Use When Hunting, Camping, Fishing, Hiking and Biking or whenever enjoying the great outdoors.

Glow-in-the-Dark Safety Cap

Will Not Freeze

ACTIVE INGREDIENTS:	
Capsaicin and related capsaicinoids*	1.4%
INERT INGREDIENTS	98.6%
TOTAL	100.0%

*Includes 0.9% Capsaicin and 0.5% other Capsaicinoids derived from Oleoresin of Capsicum

DO NOT SEEK OUT ENCOUNTERS WITH BEARS. THIS PRODUCT IS A BEAR ATTACK REPELLENT THAT MAY PROTECT USERS IN SOME UNEXPECTED CONFRONTATIONS WITH BEARS BUT MAY NOT BE EFFECTIVE IN ALL SITUATIONS OR PREVENT ALL INJURIES. READ THIS ENTIRE LABEL BEFORE TAKING THIS PRODUCT INTO AREAS WHERE BEARS MIGHT BE ENCOUNTERED.

KEEP OUT OF REACH OF CHILDREN

DANGER

Strong temporary irritant to eyes, nose and skin. Wash thoroughly with soap and water after handling.

See Back Panel for Additional Precautions

EPA Reg. No. 72265-1 EPA Est. 72265-MO-1

NET CONTENTS: 9.2 OZ.

Manufactured by: Security Equipment Corporation
330 Sun Valley Circle, Fenton, MO 63026 • (800) 325-9568
sales@sdsat.com • www.sabrefrontiersprays.com

Made in the U.S.A.

ACCEPTED
with COMMENTS
In EPA Letter Dated:
JUL 17 2000

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 72265-1

DP BARCODE: D277076

12446

CASE: 064803 DATA PACKAGE RECORD DATE: 09/26/01
SUBMISSION: S601874 BEAN SHEET Page 1 of 1

* * * CASE/SUBMISSION INFORMATION * * *

CASE TYPE: REGISTRATION ACTION: 300 ADMN-LBL REV AMND NO DATA
RANKING : 5 POINTS ()
CHEMICALS: 070701 Capsaicin (in oleoresin of capsicum) 1.3880%

ID#: 072265-00001 Frontiersman Bear Attack Deterrent
COMPANY: 072265 SECURITY EQUIPMENT CORPORATION
PRODUCT MANAGER: 04 TINA LEVINE 703-308-7055 ROOM: CM2 219
PM TEAM REVIEWER: GERALDINE MCCANN 703-605-0716 ROOM: CM2 215
RECEIVED DATE: 06/29/01 DUE OUT DATE: 09/27/01

* * * DATA PACKAGE INFORMATION * * *

DP BARCODE: 277076 EXPEDITE: Y DATE SENT: 08/15/01 DATE RET.: 10/01/01
CHEMICAL: 070701 Capsaicin (in oleoresin of capsicum)
DP TYPE: 001
CSF: Y LABEL: Y

ASSIGNED TO	DATE IN	DATE OUT	
DIV : RD	08/15/01	10/01/01	ADMIN DUE DATE: 09/29/01
BRAN: TRB	08/17/01	10/01/01	NEGOT DATE: 10/01/01
SECT: CHEM	08/17/01	10/01/01	PROJ DATE: / /
REVR : LKUTNEY	09/26/01	~~10/01/01~~ 9/28/01	
CONTR:	/ /	/ /	

* * * DATA REVIEW INSTRUCTIONS * * *

Dear Chemistry,

Please examine this product MRID # 454415-01 and provide comments or suggestions as to the nature of the product storage stability and corrosion characteristics.

If you have questions or if I can be of any help, Please call.

Thank you.

Geri McCann
605-0716

* * * DATA PACKAGE EVALUATION * * *

No evaluation is written for this data package

* * * ADDITIONAL DATA PACKAGES FOR THIS SUBMISSION * * *

DP BC	BRANCH/SECTION	DATE OUT	DUE BACK	INS	CSF	LABEL

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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

November 8, 2001

305 / 13 S-590681
305 / 11 S-596199
305 / 11 S-601874

Security Equipment Corp.
330 Sun Valley Circle
Fenton, MO 63036

Attention: Mr. Larry D. Nance

Subject Frontiersman Bear Attack Deterrent
EPA Reg. No. 72265-1
Your letters of July 28, 2000, April 18 and June 26, 2001

In the above letters, you submitted data and information on this product. We have the following comments:

A. Letter of July 28, 2000 In this letter, you submitted a revised label and Confidential Statement of Formula (CSF) . We have misplaced these documents. Please resubmit. We apologize for the inconvenience.

B. Letter of April 18, 2001 The proposed protocol for assessing spray pattern performance from containers held at various temperatures lacks detail in certain critical areas. These are:

1. the distances from the target at which containers would be tested;
2. the numbers of containers to be tested at each distance;
3. the type of facility (e.g., indoor or outdoor) in which the tests are to be run; and
4. the procedures to be used to monitor wind speed and direction.

In addition, there are other areas about which we have comments.

B. Letter of April 18, 2001-cont

Distance & temperature

1. We recommend that containers be tested 12', 18', and 25' from fixed targets, with more distances being added at your discretion.
2. We also recommend that 5 units be fired per temperature and distance, meaning that 60 containers would be needed for a test of 5 containers each at 4 fixed temperatures and 3 fixed distances.
3. Use of several containers per temperature and distance would allow us to have more confidence that results observed were due to independent variables of temperature and distance rather than the random assignment to any particular group of a container that happened to be a "dud".

Type of facility

We also recommend that tests be conducted outdoors under conditions of very slight air movement, with wind speed and direction being monitored by equipment designed for such purposes.

Selection of sample

The containers used in the study must be selected from one or more typical production batches and must not be manufactured and loaded exclusively for the proposed study.

Reduction of container temperature

The protocol does not prescribe the specific procedures to be used for "soaking" containers of your product to get them to specific temperatures. We believe that any method for cooling containers is likely to be adequate as long as it does not affect the integrity of the container.

Measurement of droplet density & diameter

The protocol also does not indicate exactly how "Droplet Density" and "Droplet Diameter" are to be measured. As there will be too many droplets for anyone to count visually, some sort of sampling or computerized optical scanning procedure must be used to determine densities and diameters of droplets.

Eye protection

The people who conduct the test must wear eye and respiratory protection.

EPA test contact

Before this test is run, your cooperator should contact our efficacy reviewer, Dr. William Jacobs, at 703-305-6406.

C. Letter of June 26, 2001

In this letter you submitted a 12 month corrosion and stability study (Guideline Nos. 830.6317 and 830.6320), MRID No. 454415-01, for this product, which was a condition of the registration of this product. We have reviewed these data and found them acceptable. Note: Have you completed the requested data on your source product, as requested in "B" of the July 17, 2000, Notice of Registration?

EPA contact

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

Sincerely,

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

Letter location

Disk 58,A:\Capsaicin\72265-1 November 8, 2001.wpd,November 8, 2001

Case: 064803 | PRAT - SUBMISSION SUBSYSTEM | Date: 11/07/01
PRIMARY REGISTRATION CASE | Time: 8 55 am

] CASE INFORMATION [

CASE TYPE: REGISTRATION ORIG ACT CD: 165 NEW PROD-OC-MINOR CHG
072265-00001 Frontiersman Bear Attack Deterrent
COMPANY NAME: 072265 SECURITY EQUIPMENT CORPORATION
PRIME CHEM: 070701 Capsaicin (in oleoresin of capsicum) MIX? N
STATUS: Active REGIST:07/17/2000RU: N CRP: N EU: N FORM: TYPE:
PM/RM:04 TINA LEVINE SAFER:

] SUBMISSION INFORMATION [

SUB BC	ACTION	RESPONSE	APPLIED	RECEIVED	RESPONSE
S581328	166 RESB NEW PRO-OC-MIN	18 COND REG/AME	06/19/00	06/20/00	07/17/00
S574389	455 ENFORCEMENT CASE REVI	11 OBJ-DATA DEF	02/01/00	02/01/00	02/07/00
S575446	455 ENFORCEMENT CASE REVI	11 OBJ-DATA DEF	02/10/00	02/10/00	04/05/00
S590081	305 TECH-LBL REV AMND DAT		07/28/00	08/03/00	/ /
S596199	305 TECH-LBL REV AMND DAT		04/18/01	04/20/01	/ /
S601874	300 ADMN-LBL REV AMND NO		06/26/01	06/29/01	/ /

DESC: revised label and CSF
COMM:

RANKING: 0
(F2)

F1 Help | Select Submission with light bar and presENTERER for
F10 Error | Submission/Data Package listESC press ESC for more choices |≡|↑|↓|

Case: 064803 | PRAT - SUBMISSION SUBSYSTEM PRIMARY REGISTRATION CASE | Date: 11/07/01 Time: 8:55 am

] CASE INFORMATION [

CASE TYPE: REGISTRATION ORIG ACT CD: 165 NEW PROD-OC-MINOR CHG
072265-00001 Frontiersman Bear Attack Deterrent
COMPANY NAME: 072265 SECURITY EQUIPMENT CORPORATION
PRIME CHEM: 070701 Capsaicin (in oleoresin of capsicum) MIX? N
STATUS: Active REGIST:07/17/2000RU: N CRP: N EU: N FORM: TYPE:
PM/RM:04 TINA LEVINE SAFER:

] SUBMISSION INFORMATION [

SUB BC	ACTION	RESPONSE	APPLIED	RECEIVED	RESPONSE
S581328	166 RESB NEW PRO-OC-MIN	18 COND REG/AME	06/19/00	06/20/00	07/17/00
S574389	455 ENFORCEMENT CASE REVI	11 OBJ-DATA DEF	02/01/00	02/01/00	02/07/00
S575446	455 ENFORCEMENT CASE REVI	11 OBJ-DATA DEF	02/10/00	02/10/00	04/05/00
S590081	305 TECH-LBL REV AMND DAT		07/28/00	08/03/00	/ /
S596199	305 TECH-LBL REV AMND DAT		04/18/01	04/20/01	/ /
S601874	300 ADMN-LBL REV AMND NO		06/26/01	06/29/01	/ /

DESC: Outline of study protocol entitled, "Low Temperature Perf
COMM: RANKING: 0 (F2)

F1 Help | Select Submission with light bar and presENTERER for
F10 Error | Submission/Data Package listESC press ESC for more choices |≡|↑|↓|

Case: 064803 | PRAT - SUBMISSION SUBSYSTEM PRIMARY REGISTRATION CASE | Date: 11/07/01 Time: 8 55 am

] CASE INFORMATION [

CASE TYPE: REGISTRATION ORIG ACT CD: 165 NEW PROD-OC-MINOR CHG
072265-00001 Frontiersman Bear Attack Deterrent
COMPANY NAME: 072265 SECURITY EQUIPMENT CORPORATION
PRIME CHEM: 070701 Capsaicin (in oleoresin of capsicum) MIX? N
STATUS: Active REGIST:07/17/2000RU: N CRP: N EU: N FORM: TYPE:
PM/RM:04 TINA LEVINE SAFER:

] SUBMISSION INFORMATION [

SUB BC	ACTION	RESPONSE	APPLIED	RECEIVED	RESPONSE
S581328	166 RESB NEW PRO-OC-MIN	18 COND REG/AME	06/19/00	06/20/00	07/17/00
S574389	455 ENFORCEMENT CASE REVI	11 OBJ-DATA DEF	02/01/00	02/01/00	02/07/00
S575446	455 ENFORCEMENT CASE REVI	11 OBJ-DATA DEF	02/10/00	02/10/00	04/05/00
S590081	305 TECH-LBL REV AMND DAT		07/28/00	08/03/00	/ /
S596199	305 TECH-LBL REV AMND DAT		04/18/01	04/20/01	/ /
S601874	300 ADMN-LBL REV AMND NO		06/26/01	06/29/01	/ /

DESC: Stability and Physical characteristics of product (MRID 4 RANKING: 0
COMM: (F2)

F1 Help | Select Submission with light bar and presENTERER for
F10 Error | Submission/Data Package listESC press ESC for more choices |≡|↑|↓|

Case: 064803 | PRAT - SUBMISSION SUBSYSTEM PRIMARY REGISTRATION CASE | Date: 11/07/01 Time: 8:55 am

] CASE INFORMATION [

CASE TYPE: REGISTRATION ORIG ACT CD: 165 NEW PROD-OC-MINOR CHG
072265-00001 Frontiersman Bear Attack Deterrent
COMPANY NAME: 072265 SECURITY EQUIPMENT CORPORATION
PRIME CHEM: 070701 Capsaicin (in oleoresin of capsicum) MIX? N
STATUS: Active REGIST:07/17/2000RU: N CRP: N EU: N FORM: TYPE:
PM/RM:04 TINA LEVINE SAFER:

] SUBMISSION INFORMATION [

SUB BC	ACTION	RESPONSE	APPLIED	RECEIVED	RESPONSE
S581328	166 RESB NEW PRO-OC-MIN	18 COND REG/AME	06/19/00	06/20/00	07/17/00
S574389	455 ENFORCEMENT CASE REVI	11 OBJ-DATA DEF	02/01/00	02/01/00	02/07/00
S575446	455 ENFORCEMENT CASE REVI	11 OBJ-DATA DEF	02/10/00	02/10/00	04/05/00
S590081	305 TECH-LBL REV AMND DAT		07/28/00	08/03/00	/ /
S596199	305 TECH-LBL REV AMND DAT		04/18/01	04/20/01	/ /
S601874	300 ADMN-LBL REV AMND NO		06/26/01	06/29/01	/ /

DESC: Stability and Physical characteristics of product (MRID 4 RANKING: 0
COMM: (F2)

F1 Help | Select Submission with light bar and presENTERER for
F10 Error | Submission/Data Package listESC press ESC for more choices |≡|↑|↓|

Case: 064803
Submission: S601874

SUBMISSION SUBSYSTEM
SUBMISSION DATA PACKAGE LIST

Date: 11/07/01
Time: 8:56 am

] CASE/SUBMISSION INFORMATION [

CASE TYPE: REGISTRATION ACTION: 300 ADMINISTRATIVE - LABEL REVISION AMEND
072265-00001 Frontiersman Bear Attack Deterrent
COMPANY NAME: 072265 SECURITY EQUIPMENT CORPORATION
PRIME CHEM: 070701 Capsaicin (in oleoresin of capsicum) MIX? N
STATUS: Active REGIST:07/17/2000RU: N CRP: N EU: N FORM: TYPE:
PM/RM:04 TINA LEVINE REVR: G MCCANN PH:605-0716 RM:CM2 215
IN:08/15/01 DUE OUT:09/27/01 (12/29/01) PM OUT: / / DUE BACK: / /

] DATA PACKAGE INFORMATION [

DP BC	EXP	BRANCH	SENT	ADMN DUE	NEGO DUE	PROJ DUE	RETURNED	GDL	INS
D277076	Y	TRB	08/15/01	09/29/01	10/01/01	/ /	09/28/01	N	Y

TYPE: 001
_CODE: 070701 Capsaicin (in oleoresin of capsicum)

RANKING: 0
(F2)

F1 Help
F10 Error

Select a data package to view with light bar and press ENTER
or press ESC for the command line

|≡|↑|↓|

Submission :S601874 | PRAT - DATA PACKAGE SUBSYSTEM | Date: 11/07/01
Data Package:D277076 | DATA PACKAGE PRIMARY RECORD | Time: 3 01 pm

] CASE/SUBMISSION INFORMATION [

CASE TYPE: REGISTRATION ACTION: 300 ADMINISTRATIVE - LABEL REVISION AMEND
072265-00001 Frontiersman Bear Attack Deterrent
COMPANY NAME: 072265 SECURITY EQUIPMENT CORPORATION
PRIME CHEM: 070701 Capsaicin (in oleoresin of capsicum) MIX? N
STATUS: Active REGIST:07/17/2000RU: N CRP: N EU: N FORM: TYPE:
PM/RM:04 TINA LEVINE REVR: G MCCANN PH:605-0716 RM:CM2 215
IN:08/15/01 DUE OUT:09/27/01 (12/29/01) PM OUT: / / DUE BACK: / /

] DATA PACKAGE INFORMATION [

SENT FROM: IRB - PM04 GMCCANN PH:605-0716 RM:CM2 215
SENT:08/15/2001ADMIN:09/29/2001PROJ: / / NEGOT:10/01/2001BACK:09/28/2001

ASSIGNED TO	DATE IN	DATE OUT	BYPASS
DIV : RD	08/15/2001	09/28/2001	Y
BRAN : TRB	08/17/2001	09/28/2001	Y
SECT : CHEM	08/17/2001	09/28/2001	Y
REVR : LKUTNEY	09/26/2001	09/28/2001	
CONTR:	/ /	/ /	

BEANS:	1
EXPEDITE:	Y
GDLN RECORDS:	N
INSTRUCTIONS:	Y
EVALUATION:	N
PRIVATE NOTE:	N

TYPE: 001 PC_CODE: 070701 Capsaicin (in oleo

F1 Help | Instructns DP eval Main menu Edit Prt Bean
F10 Error | Display the Review Instructions

Submission :S601874 | PRAT - DATA PACKAGE SUBSYSTEM | Date: 11/07/01
Data Package:D277076 | DATA PACKAGE PRIMARY RECORD | Time: 3:01 pm

] CASE/SUBMISSION INFORMATION [

CASE TYPE: REGISTRATION ACTION: 300 ADMINISTRATIVE - LABEL REVISION AMEND
072265-00001 Frontiersman Bear Attack Deterrent
COMPANY NAME: 072265 SECURITY EQUIPMENT CORPORATION
PRIME CHEM: 070701 Capsaicin (in oleoresin of capsicum) MIX? N
STATUS: Active REGIST:07/17/2000RU: N CRP: N EU: N FORM: TYPE:
PM/RM:04 TINA LEVINE REVR: G MCCANN PH:605-0716 RM:CM2 215
IN:08/15/01 DUE OUT:09/27/01 (12/29/01) PM OUT: / / DUE BACK: / /

] DATA PACKAGE INFORMATION [

SENT FROM: IRB - PM04 GMCCANN PH:605-0716 RM:CM2 215
SENT:08/15/2001ADMIN:09/29/2001PROJ: / / NEGOT:10/01/2001BACK:09/28/2001

ASSIGNED TO	DATE IN	DATE OUT	BYPASS
DIV : RD	08/15/2001	09/28/2001	Y
BRAN : TRB	08/17/2001	09/28/2001	Y
SECT : CHEM	08/17/2001	09/28/2001	Y
REVR : LKUTNEY	09/26/2001	09/28/2001	
CONTR:	/ /	/ /	

BEANS:	1
EXPEDITE:	Y
GDLN RECORDS:	N
INSTRUCTIONS:	Y
EVALUATION:	N
PRIVATE NOTE:	N

TYPE: 001 PC_CODE: 070701 Capsaicin (in oleo

F1 Help | Instructns DP eval Main menu Edit Prt Bean
F10 Error | Display the Review Instructions

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

OPPTS/OPP/RD/TRB/PRODUCT CHEMISTRY TEAM

WASHINGTON, D.C. 20460

MRID # 454415-01

DATE: 28/SEP/2001

SUBJECT: **PRODUCT CHEMISTRY REVIEW OF MP [ ] EP [X]**
DP BARCODE No.: D277076
REG./File Symbol No.: 72265-1
PRODUCT NAME: Frontiersman Bear Attack Deterrent
COMPANY: Security Equipment Corporation

FROM: Linda L. Kutney, Chemist
Product Chemistry Team
Technical Review Branch/RD (7505C)

Linda L Kutney 9/28/01

TO: Debbie McCall, Geri McCann PM-4
Insecticide-Rodenticide Branch/RD (7505C)

INTRODUCTION

Security Equipment Corporation has submitted corrosion characteristic and storage stability data in support of registration of their product, Frontiersman Bear Attack Deterrent. This product contains a label claim of 1.4% capsaicin and related capsaicinoids, intended as a means of preventing bear attacks.

Corrosion of container and % content testing was initiated on 7/12/99, the 0-month time period, and after 3, 6, and 12 months of storage.

FINDINGS:

- Frontiersman Bear Attack Deterrent was stored at 25 C (23 C to 27 C in ambient humidity), in its original aerosol can, for one year, using Security Equipment Corporation

Analytical Method, SAM 1355. The results of this testing are summarized in the table below.

- No visually observed changes (leakage or corrosion) were seen containers storing Frontiersman Bear Attack Deterrent, following one year storage period.

- Summary of Storage Stability Data for Frontiersman Bear Attack Deterrent:

Sample Date	Length of Storage	ANALYSIS, % CAPSAICIN-OIDS	LABEL CLAIM, % CAPSAICIN-OIDS
7/30/99 9/1,14/99	0 Months	1.414%	1.388% w/w
10/26/99	3 Months	1.280%	1.388% w/w
1/18/00	6 Months	1.339%	1.388% w/w
8/24/00	12 Months	1.391%	1.388% w/w

- The total amounts of Capsaicinoids throughout the one year storage study did not vary significantly from the label claim.

- Initial concentration percentages for Frontiersman Bear Attack Deterrent were very similar to final percentages.

CONCLUSION:

TRB has reviewed this submission and concludes that the corrosion characteristic and storage stability studies support the registration of Frontiersman Bear Attack Deterrent, specifically:

- Storage stability for Frontiersman Bear Attack Deterrent is adequate for 1 year under the storage conditions tested. No significant change in concentration was observed throughout the duration of the study.

- The data submitted are acceptable and satisfy the data requirements of Guideline 830.6317, for storage stability.

- The data requirements of Guideline 830.6320, corrosion characteristics, are satisfied.

DP BARCODE: D277076

CASE: 064803 DATA PACKAGE RECORD DATE: 08/15/01
SUBMISSION: S601874 BEAN SHEET Page 1 of 1

* * * CASE/SUBMISSION INFORMATION * * *

CASE TYPE: REGISTRATION ACTION: 300 ADMN-LBL REV AMND NO DATA
RANKING : 5 POINTS ()
CHEMICALS: 070701 Capsaicin (in oleoresin of capsicum) 1.3880%

ID#: 072265-00001 Frontiersman Bear Attack Deterrent
COMPANY: 072265 SECURITY EQUIPMENT CORPORATION
PRODUCT MANAGER: 04 TINA LEVINE 703-308-7055 ROOM: CM2 219
PM TEAM REVIEWER: GERALDINE MCCANN 703-605-0716 ROOM: CM2 215
RECEIVED DATE: 06/29/01 DUE OUT DATE: 09/27/01

* * * DATA PACKAGE INFORMATION * * *

DP BARCODE: 277076 EXPEDITE: Y DATE SENT: 08/15/01 DATE RET.: / /
CHEMICAL: 070701 Capsaicin (in oleoresin of capsicum)
DP TYPE: 001
CSF: Y LABEL: Y

ASSIGNED TO	DATE IN	DATE OUT	ADMIN DUE DATE: 09/29/01
DIV : RD	/ /	/ /	NEGOT DATE: / /
BRAN: TRB	/ /	/ /	PROJ DATE: / /
SECT: CHEM	/ /	/ /	
REVR :	/ /	/ /	
CONTR:	/ /	/ /	

* * * DATA REVIEW INSTRUCTIONS * * *

Dear Chemistry,

Please examine this product MRID # 454415-01 and provide comments or suggestions as to the nature of the product storage stability and corrosion characteristics.

If you have questions or if I can be of any help, Please call.

Thank you.

Geri McCann
605-0716

* * * DATA PACKAGE EVALUATION * * *

No evaluation is written for this data package

* * * ADDITIONAL DATA PACKAGES FOR THIS SUBMISSION * * *

DP BC	BRANCH/SECTION	DATE OUT	DUE BACK	INS	CSF	LABEL

JUL 3 2001

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs

SECURITY EQUIPMENT CORPORATION
330 SUN VALLEY CIRCLE
FENTON, MO 63026

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your transmittal of 06/29/01. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 86-5. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.

SECURITY
EQUIPMENT CORPORATION

454415-00

June 26, 2001

D277076
8/15/01

Document Processing Desk – APPL
Office of Pesticide Program – 7505C
U.S. ENVIRONMENTAL PROTECTION AGENCY
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

Attention: Dan Peacock, Insecticide/Rodenticide Branch

Dear Mr. Peacock:

SUBJECT: Security Equipment Corporation
Frontiersman® Bear Attack Deterrent
EPA File Registration Number: 72265-1

Security Equipment Corporation is submitting the enclosed material in support of our product's FIFRA pesticide registration.

Enclosed are four copies of our 12 month Corrosion and Stability Study.

Study Title:

454415-01

Container Appearance, Product Appearance, Sample Container Weight Loss, and Total Capsaicinoids Assay Stability Study, Physical Examination(FIFRA).

SPONSOR: Security Equipment Corporation
330 Sun Valley Circle
Fenton, Missouri 63026-4690

TEST SUBSTANCE: Frontiersman Bear Attack Deterrent

AUTHOR (STUDY DIRECTOR): Ray Podolsky
Associate Director of Chemistry, Validation and Quality Services.
Celsis Laboratory Group

TESTING LABORATORY: Celsis Laboratory Group
St. Louis Division
6200 South Lindbergh Blvd.
St. Louis, Missouri 63123

GLP ID NUMBER: 31670

STUDY SPONSOR REPRESENTATIVE: Larry D. Nance

330 Sun Valley Circle
Fenton, MO 63026

(636) 343-0200
(800) 325-9568
(636) 343-1318 Fax

E-Mail: info@sabre-sabrered.com
http://www.sabre-sabrered.com

INDEX OF DOCUMENT ENCLOSED IN THE STUDY.

Page 2. Statement of no Data Confidentiality Claims
Page 3. Good Laboratory Practices Statement
Page 4. Table of Contents
Page 5. Study Initiation and Completion Dates
Page 5. Methods and Materials
Page 7. Summary and Conclusion
Page 8 and Page 9. Table of Study Results
Page 10. Quality Assurance Unit Statement
Page 11-Page 17 Study Protocol
Page 18. Sponsor's Statement
Page 19-119 Raw Data
Page 120-Page 122 Report of Analysis

STUDY COMPLETION DATE: April 10, 2001

STUDY SPONSOR'S REPRESENTATIVE SIGNATURE: Larry D. Nance

Larry D. Nance
President
Security Equipment
Corporation

review on disk

IRB BRANCH REVIEW - TSS

Record Number(s)

D274416

review 11/6/2001

6/21/01 8/21/01

IN OUT

EFFICACY

FILE OR REG. NO. 72265-1

PETITION OR EXP. PERMIT NO.

DATE DIV. RECEIVED 4/20/01

DATE OF SUBMISSION 4/18/01

DATE SUBMISSION ACCEPTED 6/21/01

TYPE PRODUCTS(S): I, D, H, F, N, R, S

DATA ACCESSION NO(S). none

PRODUCT MGR. NO. 04

PRODUCT NAME(S) FRONTIERSMAN BEAR ATTACK DETERRENT

COMPANY NAME Security Equipment Corporation

SUBMISSION PURPOSE Have protocol for effects of temperature on spray pattern reviewed

CHEMICAL & FORMULATION 1.388% Capsaicin and related capsaicinoids

Efficacy Review: FRONTIERSMAN BEAR ATTACK DETERRENT, 72265-1
Security Equipment Corporation
Fenton, MO 63026

200.0 INTRODUCTION

200.1 Uses

A 1.388% "Capsaicin and related capsaicinoids" aerosol product Federally registered for use at unspecified sites

only to deter bears which are attacking or appear likely to attack humans.

The accepted label declares this product to be nominally 0.857% Capsaicin and 0.531% "other capsaicinoids".

200.2 Background Information

See efficacy reviews of 6/30/99, 11/9/99, 11/30/99, 1/21/00, 3/29/00, 5/31/00, and 7/11/00, along with the enforcement-case efficacy reviews of 2/7/00 and 3/15/00 which pertained primarily to unregistered products produced by Security. 72265-1 was Federally registered on 7/17/01.

This review discusses a submission of 4/18/01 which consists of a letter from Larry D. Nance, Security's President, plus a protocol dated "04/16/01" and entitled

> LOW TEMPERATURE PERFORMANCE of FRONTIERSMAN BEAR ATTACK DETERRENT.

On proposed labels originally submitted for this product prior to its registration, Security had proposed the claim

> *Highly Effective in Extreme Temperatures* ***-40° to 120°F.***

In the efficacy review of 6/30/99, I rejected that proposed claim because the product's spray pattern had been tested only for containers that had been stored over a range from -10°F to +60°F and because the temperatures of storage were "apparently not temperatures of use." Security evidently wants to develop support for an "extremes-of-temperature" claim.

201.0 DATA SUMMARY

The protocol seems to have been drafted by Security, but the testing is to be done by Marlon Bensinger of Chromtec, Brule, WI. The document is 3 pages long plus a one-page attachment. Among other things, page 1 of the document states:

> It is the goal of the study to establish some guidelines for evaluating bear deterrent spray at low temperatures.

None of the spray pattern tests run according this protocol or any variation thereof would directly assess the ability of 72265-1 to deter bears at various temperatures. Based upon some test results from various products, we have inferred that bear pepper sprays with concentrations of Capsaicin and Related Capsaicinoids which exceed an aggregate of 1.3% or so will repel bears if they are delivered to them at sufficient distances and dosages. We will continue to make that

inference if and when the results of Security's trials are submitted, unless information from other sources indicates to us that it is not warranted. If that occurs, we will have to require efficacy testing for all of the bear repellents.

For the test, containers are to be loaded with 174 g of "concentrate" plus 83 g of "propellant". The loaded containers are to be stored at a range of temperatures, with the one "suggested" being "20° C,10° C,-10° C and -20° C." Those temperatures are equivalent to 68°F, 50°F, 14°F, and -4°F, respectively. To achieve those temperatures, the loaded cans would be subjected to

> "soaking" ... for 8 to 12 hours at the desired temperature.

The temperature of each soaked can's exterior would be monitored by a "low temperature thermometer" attached to it. The protocol does not indicate in what the containers would be "soaked" to get them to temperatures below the freezing point of water, but there are likely be established procedures for doing that. After "soaking", the containers are to be "quickly sprayed" to assess "Distance and Spray Pattern."

The protocol states that performance of containers at various temperatures is to be assessed

> by spraying onto a white background such as paper or poster board placed at given distances away from the spray source.... The spray distance is determined by the distance where the majority of the mass of the spray emanating from the canister hits the target positioned at the same height as the originating spray.

The accepted label for 72265-1 bears a claim of 18'-25' of effective spray distance. At the very least, containers held at the various temperatures should be tested at those fixed distances. Shorter or longer distances also could be tested to see whether the point at which "the majority of the mass of the spray" impinges on the paper varies with container temperature. I expect that it would.

Varying distance as well as temperature would produce a test with many experimental cells, which would require many containers (and much pepper spray to which researchers would be potentially exposed). One way to limit the number of containers needed would be to limit the distances at which containers are tested. Obviously, the 18' and 25' test distance should be used. I would like to see results documented at a shorter distance such as 12'. Security also might want to test a longer distance as the results of the study possibly could support changing the distance claim to one closer to those being claimed by certain competitors.

The protocol identifies the following (to be) "Reported Results:"

> Temperature Spray Distance Droplet Density Droplet Diameter.

The protocol does not indicate what procedures are to be used to measure the dependent variables "Droplet Density" and "Droplet Diameter". I would assume that this information is to be observed at points of impingement (on vertical targets) and optically scanned or measured over sample areas within the overall pattern. It would take a very long time to count and measure all of the droplets.

The spray-pattern studies that I discussed in the efficacy reviews of 6/30/99, 11/9/99, and

1/21/00 were not of great quality. Perhaps the conduct and reporting will improve if a facility other than Security runs the proposed trials.

My specific comments on the proposed protocol appear under "CONCLUSIONS".

202.0 CONCLUSIONS

1. The proposed protocol for assessing spray pattern performance from containers held at various temperatures lacks detail in certain critical areas. These are:

   a. the distances from the target at which containers would be tested;

   b. the numbers of containers to be tested at each distance;

   c. the type of facility (e.g., indoor or outdoor) in which the tests are to be run;

   d. the procedures to be used to monitor wind speed and direction.

   We recommend that containers be tested 12', 18', and 25' from fixed targets, with more distances being added at your discretion. We also recommend that 5 units be fired per temperature and distance, meaning that 60 containers would be needed for a test of 5 containers each at 4 fixed temperatures and 3 fixed distances. Use of several containers per temperature and distance would allow us to have more confidence that results observed were due to independent variables of temperature and distance rather than the random assignment to any particular group of a container that happened to be a "dud". We also recommend that tests be conducted outdoors under conditions of very slight air movement, with wind speed and direction being monitored by equipment designed for such purposes.

   The containers used in the study should be selected from one or more typical production batches and should not be manufactured and loaded exclusively for the proposed study.

   The protocol does not prescribe the specific procedures to be used for "soaking" containers of your product to get them to specific temperatures. We believe that any method for cooling containers is likely to be adequate as long as it does not affect the integrity of the container.

   The protocol also does not indicate exactly how "Droplet Density" and "Droplet Diameter" are to be measured. As there will be too many droplets for anyone to count visually, some sort of sampling or computerized optical scanning procedure must be used to determine densities and diameters of droplets.

   The people who conduct the test should wear eye and respiratory protection.

   Before this test is run, your cooperator should contact our efficacy reviewer, Dr. William Jacobs, at 703-305-6406.

William W. Jacobs
Biologist
Insecticide-Rodenticide Branch
August 20, 2001

DP BARCODE: D274416

CASE: 064803 DATA PACKAGE RECORD DATE: 04/26/01
SUBMISSION: S596199 BEAN SHEET Page 1 of 1

* * * CASE/SUBMISSION INFORMATION * * *

CASE TYPE: REGISTRATION ACTION: 305 TECH-LBL REV AMND DATA RE
RANKING : 10 POINTS ()
CHEMICALS: 070701 Capsaicin (in oleoresin of capsicum) 1.3880%

ID#: 072265-00001 Frontiersman Bear Attack Deterrent
COMPANY: 072265 SECURITY EQUIPMENT CORPORATION
PRODUCT MANAGER: 04 MEREDITH LAWS 703-308-9366 ROOM: CM2 276
PM TEAM REVIEWER: DANIEL PEACOCK 703-305-5407 ROOM: CM2 221
RECEIVED DATE: 04/20/01 DUE OUT DATE: 10/17/01

* * * DATA PACKAGE INFORMATION * * *

DP BARCODE: 274416 EXPEDITE: N DATE SENT: 04/26/01 DATE RET.: / /
CHEMICAL: 070701 Capsaicin (in oleoresin of capsicum)
DP TYPE: 001
CSF: N LABEL: N

ASSIGNED TO	DATE IN	DATE OUT	ADMIN DUE DATE: 09/13/01
DIV : RD	/ /	/ /	NEGOT DATE: / /
BRAN: IRB	/ /	/ /	PROJ DATE: / /
SECT: PM04	/ /	/ /	
REVR : wy	6/21/01	8/20/01 RL	
CONTR:	/ /	/ /	

* * * DATA REVIEW INSTRUCTIONS * * *

Bill,

Please review and comment on attached outline of study protocol entitled, "Low Temperature Performance of Frontiersman Bear Attack Deterrent".

Thank you,

Dan Peacock
305-5407

* * * DATA PACKAGE EVALUATION * * *

No evaluation is written for this data package

* * * ADDITIONAL DATA PACKAGES FOR THIS SUBMISSION * * *

DP BC	BRANCH/SECTION	DATE OUT	DUE BACK	INS	CSF	LABEL

Proposed Study Protocol
LOW TEMPERATURE PERFORMANCE
of
FRONTIERSMAN BEAR ATTACK DETERRENT

04/16/01

The data for this study will be submitted to the Environmental Protection Agency to support our registration
EPA Registration Number 72265 1
EPA Registration Date July 17 2000

STUDY NUMBER 1FAD – BS2001
Study Title Evaluation parameters for Low Temperature Performance of Frontiersman Bear Attack Deterrent

Purpose This Study is designed to assess the characteristics of the Frontiersman Bear Attack Deterrent at extremely low temperatures

Goal Historically the physical properties of bear deterrent sprays are listed or claimed at 20 to 25 degrees Centigrade This is acceptable if the bear deterrent spray is always used at or above 20 degrees Centigrade However, the product is often used at temperatures lower than 20 degrees Centigrade It is the goal of the study to establish some guidelines for evaluating bear deterrent spray at low temperatures

Test Substance Frontiersman Bear Attack Deterrent

Sponsor Security Equipment Corporation
330 Sun Valley Circle
Fenton Missouri 63026-4690

Sponsor Representative Larry Nance

Test Facility CHROMTEC
71245 Oulu Road
Brule WI 54820 9641
Alteration of Design

Alteration of this protocol may be made as the study progresses

Study Personel:

Marlin Bensinger – Study Director

Additional personnel will be documented in the study raw data collection and presented in the final report.

Proposed Study Date:

Study Start Date:

Duration of the Study:

Study Completion Date:

Description, lot numbers, and handling operation as well as other pertinent information will be documented in the study data.

Archival Samples: Samples of units manufactured from the same batch will be stored in the shelf life testing area of our warehouse.

Disposition of the samples used during testing: Samples used during the study both partially empty or totally empty will be disposed of in accordance with the State of Missouri Department of Natural Resources – Division of Environmental Quality Hazardous Waste Program.

Our EPA number for Hazardous waste is the following: EPA ID: MO000035984
Missouri ID: 26846

Preservation of Records:

All data documenting study details and study procedures and observations will be recorded and maintained as Raw Data.

Study Director_____ Date:_____

Larry Nance
President
Security Equipment Corporation
330 Sun Valley Circle
Fenton, Missouri 63026

INSTRUCTIONS FOR SPRAY PATTERN TEST

Each canister will be marked with our Frontiersman Bear Attack Deterrent Label. Each Canister will be marked with lot and batch numbers and an additional number used to identify results. Each canister will be weighed during manufacture to be sure the exact formulation filed with the EPA is duplicated. They will be weighed as follows:

1. An empty can and valve 49gr.
2. A can filled with concentrate 223gr.
3. A can filled with concentrate and propellant 306gr.
4. The net weight will be 257gr.(9.17oz.)

The weights will be taken using a triple beam O'Haus Scale which is calibrated in accordance with the bureau of Weights and Measures. A calibration report is included with this study.

Spray distances for bear deterrents have historically been determined by spraying onto a white background such as paper or poster board placed at given distances away from the spray source. The orange and red pigments present in the oleoresin capsicum in the spray can readily be seen against the white background and measured from point of origin. The same principle can be used for this series of tests. The spray distance is determined by the distance where the majority of the mass of the spray emanating from the canister hits the target positioned at the same height as the originating spray.

The test temperature of the canister is obtained by "soaking" the canister for 8 to 12 hours at the desired temperature. A low temperature thermometer is attached to the canister. The contents of the canister is brought to equilibrium temperature. The canister is quickly sprayed to determine Distance and Spray Pattern.

The suggested test temperatures are as follows: 20° C,10° C, -10° C and -20° C.

Reported Results:

Temperature Spray Distance Droplet Density Droplet Diameter

DATE 4/10/2001 LOCATION St. Louis

INSTRUMENT S/N OR ID# 316004

CAPACITY 2610 X 1g CONDITION AS FOUND

LAST DATE TESTED N/A

New Equipment

TEST WEIGHT

APPLIED	READING	ERROR	ADJUST	WT. S/N
10g	10g	±0	—	—
100g	100g		—	—
500g	500g		—	—
1,000g	1,000g		—	—
2,000g	2,000g		—	—

CORNER 1 2 3 4

TECH. Jim

DATE NEXT INSP. DUE

COMMENTS :

New Scale

OHAUS TRIPLE BEAM SCALE

SIGN.

DATE LOCATION

INSTRUMENT S/N OR ID#

CAPACITY X CONDITION AS FOUND

LAST DATE TESTED

TEST WEIGHT

APPLIED	READING	ERROR	ADJUST	WT. S/N

CORNER 1 2 3 4

TECH.

DATE NEXT INSP. DUE

COMMENTS :

SIGN.

Proposed Study Protocol
LOW TEMPERATURE PERFORMANCE
of
FRONTIERSMAN BEAR ATTACK DETERRENT

04/16/01

The data for this study will be submitted to the Environmental Protection Agency to support our registration.
EPA Registration Number: 72265-1
EPA Registration Date: July 17,2000

STUDY NUMBER: 1FAD – BS2001
Study Title: Evaluation parameters for Low Temperature Performance of Frontiersman Bear Attack Deterrent

Purpose: This Study is designed to assess the characteristics of the Frontiersman Bear Attack Deterrent at extremely low temperatures.

Goal: - Historically, the physical properties of bear deterrent sprays are listed or claimed at 20 to 25 degrees Centigrade This is acceptable if the bear deterrent spray is always used at or above 20 degrees Centigrade. However, the product is often used at temperatures lower than 20 degrees Centigrade. It is the goal of the study to establish some guidelines for evaluating bear deterrent spray at low temperatures.

Test Substance: Frontiersman Bear Attack Deterrent

Sponsor: Security Equipment Corporation
330 Sun Valley Circle
Fenton, Missouri 63026-4690

Sponsor Representative: Larry Nance

Test Facility: CHROMTEC
71245 Oulu Road
Brule, WI 54820-9641
Alteration of Design:

Alteration of this protocol may be made as the study progresses.

Study Personel:

Marlin Bensinger – Study Director

Additional personnel will be documented in the study raw data collection and presented in the final report.

Proposed Study Date:

Study Start Date:

Duration of the Study:

Study Completion Date:

Description, lot numbers, and handling operation as well as other pertinent information will be documented in the study data.

Archival Samples: Samples of units manufactured from the same batch will be stored in the shelf life testing area of our warehouse.

Disposition of the samples used during testing: Samples used during the study both partially empty or totally empty will be disposed of in accordance with the State of Missouri Department of Natural Resources – Division of Environmental Quality Hazardous Waste Program.

Our EPA number for Hazardous waste is the following: EPA ID: MO000035984 Missouri ID: 26846

Preservation of Records:

All data documenting study details and study procedures and observations will be recorded and maintained as Raw Data.

Study Director_____ Date:_____

Larry Nance
President
Security Equipment Corporation
330 Sun Valley Circle
Fenton, Missouri 63026

INSTRUCTIONS FOR SPRAY PATTERN TEST

Each canister will be marked with our Frontiersman Bear Attack Deterrent Label. Each Canister will be marked with lot and batch numbers and an additional number used to identify results. Each canister will be weighed during manufacture to be sure the exact formulation filed with the EPA is duplicated. They will be weighed as follows:

1. An empty can and valve 49gr.
2. A can filled with concentrate 223gr.
3. A can filled with concentrate and propellant 306gr.
4. The net weight will be 257gr.(9.17oz.)

The weights will be taken using a triple beam O'Haus Scale which is calibrated in accordance with the bureau of Weights and Measures. A calibration report is included with this study.

Spray distances for bear deterrents have historically been determined by spraying onto a white background such as paper or poster board placed at given distances away from the spray source. The orange and red pigments present in the oleoresin capsicum in the spray can readily be seen against the white background and measured from point of origin. The same principle can be used for this series of tests. The spray distance is determined by the distance where the majority of the mass of the spray emanating from the canister hits the target positioned at the same height as the originating spray.

The test temperature of the canister is obtained by "soaking" the canister for 8 to 12 hours at the desired temperature. A low temperature thermometer is attached to the canister. The contents of the canister is brought to equilibrium temperature. The canister is quickly sprayed to determine Distance and Spray Pattern.

The suggested test temperatures are as follows: 20° C,10° C, -10° C and -20° C.

Reported Results:

Temperature Spray Distance Droplet Density Droplet Diameter

DATE 4/10/2001 LOCATION St. Louis

INSTRUMENT S/N OR ID# 316004

CAPACITY 2610 X 1g

CONDITION AS FOUND

New Equipment

LAST DATE TESTED N/A

TEST WEIGHT

APPLIED	READING	ERROR	ADJUST	WT. S/N
10g	10g	±0	—	—
100g	100g		—	—
500g	500g		—	—
1,000g	1,000g		—	—
2,000g	2,000g		—	—

CORNER 1 2 3 4

TECH. Jim

DATE NEXT INSP. DUE

COMMENTS :

New Scale

OHAUS TRIPLE BEAM SCALE

SIGN.

DATE LOCATION

INSTRUMENT S/N OR ID#

CAPACITY X

CONDITION AS FOUND

LAST DATE TESTED

TEST WEIGHT

APPLIED	READING	ERROR	ADJUST	WT. S/N

CORNER 1 2 3 4

TECH.

DATE NEXT INSP. DUE

COMMENTS :

SIGN.

SECURITY
EQUIPMENT CORPORATION

need to also find
7/28/2000 submission
revised label &
CSF
5-590081

April 18, 2001
U.S. ENVIROMENTAL PROTECTION AGENCY
Office of Pesticide Programs – 7505C
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202
FAX 703-305-6596

Attention: Dan Peacock, Insecticide/Rodenticide Branch

Reference: EPA Registration Number: 72265-1

Dr. Mr. Peacock:

According to your instructions I have drafted a Study Protocol titled" Low Temperature Performance of Frontiersman Bear Attack Deterrent".

The following 4 pages are the outline of this study. Please review and advise if this will be acceptable. I will send to you the originals next day air. I look forward to your comments and or approval of my Proposed Study Protocol.

I just received the final report for the 12 month stability study for Frontiersman Bear Attack Deterrent. I am reviewing it and will send it to you this week.

Best regards,
Larry D. Nance
Larry D. Nance
President

330 Sun Valley Circle
Fenton, MO 63026

(636) 343-0200
(800) 325-9568
(636) 343-1318 Fax

E-Mail: info@sabre-sabrered.com
http://www.sabre-sabrered.com

US ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF PESTICIDES PROGRAMS
REGISTRATION DIVISION (7504C)
WASHINGTON, DC 20460

NOTICE OF PESTICIDE: REGISTRATION / REREGISTRATION

(Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended)

EPA REGISTRATION NO.	DATE OF ISSUANCE
72265-1	July 17, 2000

TERM OF ISSUANCE

NAME OF PESTICIDE PRODUCT

Frontiersman Bear Attack Deterrent

NAME AND ADDRESS OF REGISTRANT (Include ZIP code)

166/18 S-581328

Security Equipment Corp.
330 Sun Valley Circle
Fenton, MO 63036

Attention: Mr. Larry D. Nance

NOTE: Changes in labeling/formula differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above U.S. EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby Registered under the Federal Insecticide, Fungicide, and Rodenticide Act.

A copy of the labeling accepted in connection with this Registration/Reregistration is returned herewith.

Registration is in no way to be construed as an endorsement or approval of this product by this Agency. In order to protect health and the environment, the Administrator, on his motion, may at an time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA sec. 3(c)(7)(A) provided that you:

Labeling changes

A. Submit one (1) copy of final printed labeling with the following changes before you release the product for shipment:

1. On the Back Panel of your Aerosol label, you included the following text:

Expiration Date: 5/2/02. Discard unit after date of expiration.

SIGNATURE OF APPROVING OFFICIAL	DATE
Daniel B. Peacock	JUL 17 2000

EPA Form 8570-6 (Rev. 5-76) PREVIOUS EDITION MAY BE USED UNTIL SUPPLY IS EXHAUSTED

Labeling changes-continued

According to FIFRA's labeling requirements [40 CFR 156.10(g)(6)]:

> Deterioration. Pesticides which change in chemical composition significantly must meet the following labeling requirements:
>
> > (i) In cases where it is determined that a pesticide formulation changes chemical composition significantly, the product must bear the following statement in a prominent position on the label: ``Not for sale or use after [date]."
> >
> > (ii) The product must meet all label claims up to the expiration time indicated on the label.

Modify your proposed text to read:

> Expiration Date: Not for sale or use after [insert date]. Then follow "Disposal" text.

Place this text under the Ingredient Statement, wherever it appears, in a separate section and in the same type size as the text "Active Ingredients" and "Inert Ingredients".

2. Delete the promotional claim "**Will Not Freeze**"as we have no data to support it. We will evaluate the claim when we receive the freezing-point data for this product.

3. Delete the promotional claim "**Glow-in-the-Dark Safety Cap**" We found nothing in the "market samples" that you submitted which appears to be a "**Safety Cap**". The **orange clip** which serves to block accidental depression of the trigger is not a "cap". It also failed to glow in the dark when we tested it for that property.

4. Insert a comma between "before" and "you" in the third sentence of the first paragraph of the "**APPLICATION DIRECTIONS:**" subsection of the "**DIRECTIONS FOR USE**". In the fourth sentence of the same paragraph, insert a comma between "container" and "wind".

5. Enclosed is guidance on the "Minimum Type Sizes for Final Printed Labels". Make sure that the following text is in the correct type size:

   a. Signal Word
   b. "Keep Out of Reach of Children"
   c. "Storage and Disposal"
   d. "DO NOT SEEK ... MIGHT BE ENCOUNTERED" (same size as "Keep Out of Reach of Children"
   e. Other text (6 Point)

Chemistry data-submissions

B. Submit the following additional chemistry data on your source product, 6% Capsaicin, within 15 months of registration:

1. Description of material used to produce product,
2. Discussion of formula of impurities, if any, in manufacturing process
3. Confidential Statement of Formula (CSF) showing certified limits of active ingredient.

C. Submit the following additional chemistry data on your formulated product within 15 months of registration:

1. storage stability
2. corrosion characteristics
3. freezing point and
4. flash point

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

A copy of the stamped label is enclosed for you records.

Sincerely,

Daniel B. Peacock

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

Enclosures

1. Stamped Label
2. Minimum Type Sizes for Final Printed Labeling

Copy to:

RegWest Company
P.O. Box 2220
Greeley, Co 80632-2220

Attention: Ms.Kim Davis

Letter location

A:\Frontiersman\72265-1 Not of Reg.wpdJuly 17, 2000

72265-1
enclosure

Minimum Type Sizes for Final Printed Labels[1]		
Size of Label on Front Panel in Square Inches	Minimum Type Size	
	SIGNAL WORD [All Capitals] and "Restricted Use Pesticide"	"Keep Out of Reach of Children" and "Storage and Disposal"
5 and under	6 point	6 point
above 5 to 10	10 point	6 point
above 10 to 15	12 point	8 point
above 15 to 30	14 point	10 point
over 30	18 point	12 point

Note: No type on label can be less than 6 Point.

18 point POISON DANGER WARNING CAUTION
12 point KEEP OUT OF REACH OF CHILDREN
12 point Keep Out of Reach of Children

---

14 point POISON DANGER WARNING CAUTION
10 point KEEP OUT OF REACH OF CHILDREN
10 point Keep Out of Reach of Children

---

12 point POISON DANGER WARNING CAUTION
8 point KEEP OUT OF REACH OF CHILDREN
8 point Keep Out of Reach of Children

---

10 point POISON DANGER WARNING CAUTION
6 point KEEP OUT OF REACH OF CHILDREN
6 point Keep Out of Reach of Children

---

6 point POISON DANGER WARNING CAUTION
6 point KEEP OUT OF REACH OF CHILDREN
6 point Keep Out of Reach of Children

---

[1]40 CFR 156.10(a)(2)(ii)(A); (h)(1)(iv); (i)(2)(ix); and (j)(2)(i)(A).

Aerosol
Container
Label

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

DANGER: May cause irreversible eye damage if sprayed directly in the eyes at close range. Contact through touching or rubbing the eye may cause moderate eye irritation. Avoid contact with skin or clothing. Wash thoroughly with soap and water after handling.

First Aid

Have label with you when obtaining treatment advice. Call a poison control center, doctor, or 1-800-325-9568 immediately for treatment advice.

IF ON SKIN OR CLOTHING – Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes.

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.

Physical or Chemical Hazards

Flammable. Contents under pressure. Keep away from heat, sparks and open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

Environmental Hazards

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

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 that are attacking or appear likely to attack humans. This product may not be effective in all situations or prevent all injuries. Do not spray this product on objects, tents or humans; such use has no deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. 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 that may have become contaminated with this product.

This product has an effective range of 18 to 25 feet.
The canister empties in approximately 5 seconds.

Fig. 1

Fig. 2

Fig. 3

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 below and familiarize yourself with these procedures. If you have not used this product before you should obtain a training can and practice with it until you can perform these activities quickly and accurately. If you test-fire this container make sure the wind is at your back and depress the actuator tab for no more than half a second. Do not test-fire in areas inhabited by bears. After test firing, clean nozzle and can with soap and water to remove residue from the can.

To Arm and Apply: This product is designed for one-handed operation. Place forefinger through hole in handle with thumb on orange safety clip curl. Pull safety clip straight back and off using thumb (Fig. 1). Depress actuator tab for burst of spray (Fig. 2).

Aim at face and eyes of bear. Press trigger for 3 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

To Disarm: Replace orange safety clip by firmly pushing with thumb until audible "snap" is heard (Fig. 3). Check to see if safety clip is securely in place. No gap should be visible between the actuator handle and the safety clip.

Storage and Disposal

Storage: Store in a cool, dry place inaccessible to children and pets. Do not store in places where the temperature may exceed 120°F. Disposal: When container is empty, press valve to release all pressure. Replace safety clip, wrap container and discard in trash. Do not incinerate or puncture.

Expiration Date: 5/0/02. Discard unit after date of expiration.

FRONTIERSMAN.

BEAR ATTACK DETERRENT

To Deter Bears From Attacking Humans

For Use When Hunting, Camping, Fishing, Hiking and Biking or whenever enjoying the great outdoors.

Glow-in-the-Dark Safety Cap

Will Not Freeze

ACTIVE INGREDIENTS:

Capsaicin and related capsaicinoids*	1.4%
INERT INGREDIENTS	98.6%
TOTAL	100.0%

*Includes 0.9% Capsaicin and 0.5% other Capsaicinoids derived from Oleoresin of Capsicum

DO NOT SEEK OUT ENCOUNTERS WITH BEARS. THIS PRODUCT IS A BEAR ATTACK REPELLENT THAT MAY PROTECT USERS IN SOME UNEXPECTED CONFRONTATIONS WITH BEARS BUT MAY NOT BE EFFECTIVE IN ALL SITUATIONS OR PREVENT ALL INJURIES. READ THIS ENTIRE LABEL BEFORE TAKING THIS PRODUCT INTO AREAS WHERE BEARS MIGHT BE ENCOUNTERED.

KEEP OUT OF REACH OF CHILDREN

DANGER

Strong temporary irritant to eyes, nose and skin.
Wash thoroughly with soap and water after handling.

See Back Panel for Additional Precautions

EPA Reg. No. 72265-1 EPA Est. 72265-MO-1

NET CONTENTS: 9.2 OZ.

Manufactured by: Security Equipment Corporation
330 Sun Valley Circle, Fenton, MO 63026 • (800) 325-9568
sabre@stlnet.com • www.sabredefensesprays.com

Made in the U.S.A.

ACCEPTED
with COMMENTS
in EPA Letter Dated:

JUL 17 2000

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 72265-1

Hang Tag Label

Made in the USA

FRONTIERSMAN

BEAR ATTACK DETERRENT

To Deter Bears From Attacking Humans

For Use When Hunting, Camping, Fishing, Hiking and Biking or whenever enjoying the great outdoors.

ACTIVE INGREDIENTS:

Capsaicin and related capsaicinoids*	1.4%
INERT INGREDIENTS	98.6%
TOTAL	100.0%

*Includes 0.9% Capsaicin and 0.5% other Capsaicinoids derived from Oleoresin of Capsicum

KEEP OUT OF REACH OF CHILDREN

DANGER

Strong temporary irritant to eyes, nose and skin. Wash thoroughly with soap and water after handling.

See Back Panel for Additional Precautions

ACCEPTED with COMMENTS in EPA Letter Dated: JUL 17 2000

Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No. 72265-1

MADE AND PRINTED IN THE USA

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

DANGER: May cause irreversible eye damage if sprayed directly in the eyes at close range. Contact through touching or rubbing the eye may cause moderate eye irritation. Avoid contact with skin or clothing. Wash thoroughly with soap and water after handling.

First Aid

Have label with you when obtaining treatment advice. Call a poison control center, doctor, or 1-800-325-9668 immediately for treatment advice.

IF ON SKIN OR CLOTHING – Take off contaminated clothing. Rinse skin immediately with plenty of water for 15–20 minutes.

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.

Physical or Chemical Hazards

Flamable. Contents under pressure. Keep away from heat, sparks and open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

Environmental Hazards

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

DIRECTIONS FOR USE

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

Refer to canister and insert for complete Directions for Use.

Storage and Disposal

STORAGE: Store in a cool, dry place inaccessible to children and pets. Do not store in places where the temperature may exceed 120°F. DISPOSAL: When container is empty, press valve to release all pressure. Replace safety clip, wrap container and discard in trash. Do not incinerate or puncture.

EPA Reg. No. 72265-1 EPA Est. 72265-MO-1

BAR CODE

SECURITY EQUIPMENT CORPORATION

330 Sun Valley Circle
Fenton, MO 63026

Insert Label

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

DANGER: May cause irreversible eye damage if sprayed directly in the eyes at close range. Contact through touching or rubbing the eye may cause moderate eye irritation. Avoid contact with skin or clothing. Wash thoroughly with soap and water after handling.

First Aid

Have label with you when obtaining treatment advice. Call a poison control center, doctor, or 1-800-325-9568 immediately for treatment advice.

IF ON SKIN OR CLOTHING – Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes.

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.

Physical or Chemical Hazards

Flammable. Contents under pressure. Keep away from heat, sparks and open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

Environmental Hazards

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

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 that are attacking or appear likely to attack humans. This product may not be effective in all situations or prevent all injuries. Do not spray this product on objects, tents or humans; such use has no deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. 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 that may have become contaminated with this product.

This product has an effective range of 18 to 25 feet.
The canister empties in approximately 5 seconds.

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 below and familiarize yourself with these procedures. If you have not used this product before you should obtain a training can and practice with it until you can perform these activities quickly and accurately. If you test-fire this container make sure the wind is at your back and depress the actuator tab for no more than half a second. Do not test-fire in areas inhabited by bears. After test firing, clean nozzle and can with soap and water to remove residue from the can.

Fig. 1

Fig. 2

Fig. 3

To Arm and Apply: This product is designed for one-handed operation. Place forefinger through hole in handle with thumb on orange safety clip curl. Pull safety clip straight back and off using thumb (Fig. 1). Depress actuator tab for burst of spray (Fig. 2).

Aim at face and eyes of bear. Press trigger for 3 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

To Disarm: Replace orange safety clip by firmly pushing with thumb until audible "snap" is heard (Fig. 3). Check to see if safety clip is securely in place. No gap should be visible between the actuator handle and the safety clip.

Storage and Disposal

Storage: Store in a cool, dry place inaccessible to children and pets. Do not store in places where the temperature may exceed 120°F. Disposal: When container is empty, press valve to release all pressure. Replace safety clip, wrap container and discard in trash. Do not incinerate or puncture.

EPA Reg. No. 72265-1 EPA Est. 72265-MO-1
SECURITY EQUIPMENT CORPORATION
330 Sun Valley Circle, Fenton, MO 63026

ACCEPTED
with COMMENTS
in EPA Letter Dated:

JUL 17 2000

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 72265-1

Do not stamp.
Stamp printed labeling.
This copy lacks graphics

working copy

[Aerosol Container – Front Panel]

FRONTIERSMAN®
BEAR ATTACK DETERRENT

To Deter Bears from Attacking Humans
For Use When Hunting, Camping, Fishing, Hiking and Biking
or whenever enjoying the great outdoors.

Glow-in-the-Dark Safety Cap — delete
Will Not Freeze — delete

? when get data, (1) consider changes to these 3 words

ACTIVE INGREDIENTS:

Capsaicin and related capsaicinoids*	1.4%
INERT INGREDIENTS	98.6%
Total	100.0%

*Includes 0.9% Capsaicin and 0.5% other Capsaicinoids derived from Oleoresin of Capsicum

DO NOT SEEK OUT ENCOUNTERS WITH BEARS. THIS PRODUCT IS A BEAR ATTACK REPELLENT THAT MAY PROTECT USERS IN SOME UNEXPECTED CONFRONTATIONS WITH BEARS BUT MAY NOT BE EFFECTIVE IN ALL SITUATIONS OR PREVENT ALL INJURIES. READ THIS ENTIRE LABEL BEFORE TAKING THIS PRODUCT INTO AREAS WHERE BEARS MIGHT BE ENCOUNTERED.

Keep Out of Reach of Children — provide co with min type sizes (2)

DANGER — provide co with min type sizes (3)

Strong temporary irritant to eyes, nose and skin.
Wash thoroughly with soap and water after handling.
See Back Panel for Additional Precautions

EPA Reg. No. 72265-1 **EPA Est. 72265-MO-1**

NET CONTENTS: 9.2 OZ.

Manufactured by:
SECURITY EQUIPMENT CORPORATION
330 Sun Valley Circle
Fenton, MO 63026
sabre@stlnet.com
www.sabredefensesprays.com
(800) 325-9568

Made in the U.S.A.

[Aerosol Container – Back Panel]

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

DANGER: May cause irreversible eye damage if sprayed directly in the eyes at close range. Contact through touching or rubbing the eye may cause moderate eye irritation. Avoid contact with skin or clothing. Wash thoroughly with soap and water after handling.

First Aid

Have label with you when obtaining treatment advice. Call a poison control center, doctor or 1-800-325-9568 immediately for treatment advice.	
If on Skin or Clothing	• Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes.
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.

Physical or Chemical Hazards

Flammable. Contents under pressure. Keep away from heat, sparks and open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

Environmental Hazards

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

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 that are attacking or appear likely to attack humans. This product may not be effective in all situations or prevent all injuries. Do not spray this product on objects, tents or humans; such use has **no** deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. 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 that may have become contaminated with this product.

This product has an effective range of 18 to 25 feet. The canister empties in approximately 5 seconds.

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 below and familiarize yourself with these procedures. If you have not used this product before you should obtain a training can and practice with it until you can perform these activities quickly and accurately. If you test-fire this container make sure the wind is at your back and depress the actuator tab for no more than half a second. Do not test-fire in areas inhabited by bears. After test firing, clean nozzle and can with soap and water to remove residue from the can.

To Arm and Apply: This product is designed for one-handed operation. Place forefinger through hole in handle with thumb on orange safety clip curl. Pull safety clip straight back and off using thumb (Fig. 1). Depress actuator tab for burst of spray (Fig. 2). Aim at face and eyes of bear. Press trigger for 3 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

To Disarm: Replace orange safety clip by firmly pushing with thumb until audible "snap" is heard (Fig. 3). Check to see if safety clip is securely in place. No gap should be visible between the actuator handle and the safety clip.

Location has changed

(4) need figure

(5) need figure

(6) need figure

Fig. 1

Fig. 2

Fig. 3

Storage and Disposal

Storage: Store in a cool, dry place inaccessible to children and pets. Do not store in places where the temperature may exceed 120°F.
Disposal: When container is empty, press valve to release all pressure. Replace safety clip, wrap container and discard in trash. Do not incinerate or puncture.

Expiration Date: 5/2/02. Discard unit after date of expiration.

(9) where is the best place to put this statement?

[Holster Unit Hang Tag – Front Panel]

FRONTIERSMAN®
BEAR ATTACK DETERRENT

To Deter Bears from Attacking Humans
For Use When Hunting, Camping, Fishing, Hiking and Biking
or whenever enjoying the great outdoors.

ACTIVE INGREDIENTS:

Capsaicin and related capsaicinoids*	1.4%
INERT INGREDIENTS	98.6%
Total	100.0%

*Includes 0.9% Capsaicin and 0.5% other Capsaicinoids derived from Oleoresin of Capsicum

Keep Out of Reach of Children

DANGER

Strong temporary irritant to eyes, nose and skin.
Wash thoroughly with soap and water after handling.
See Back Panel for Additional Precautions

[Holster Unit Hang Tag – Back Panel]

PRECAUTIONARY STATEMENTS
Hazards to Humans & Domestic Animals

DANGER: May cause irreversible eye damage if sprayed directly in the eyes at close range. Contact through touching or rubbing the eye may cause moderate eye irritation. Avoid contact with skin or clothing. Wash thoroughly with soap and water after handling.

First Aid

Have label with you when obtaining treatment advice. Call a poison control center, doctor or 1-800-325-9568 immediately for treatment advice.

If on Skin or Clothing – Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes.

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.

Physical or Chemical Hazards

Flammable. Contents under pressure. Keep away from heat, sparks and open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

Environmental Hazards

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

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.
Refer to canister and insert for complete Directions for Use.

Storage and Disposal

Storage: Store in a cool, dry place inaccessible to children and pets. Do not store in places where the temperature may exceed 120°F.
Disposal: When container is empty, press valve to release all pressure. Replace safety clip, wrap container and discard in trash. Do not incinerate or puncture.

EPA Reg. No. 72265-1 **EPA Est. 72265-MO-1**

SECURITY EQUIPMENT CORPORATION
330 Sun Valley Circle, Fenton, MO 63026

Do not Stamp

[Insert]

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

DANGER: May cause irreversible eye damage if sprayed directly in the eyes at close range. Contact through touching or rubbing the eye may cause moderate eye irritation. Avoid contact with skin or clothing. Wash thoroughly with soap and water after handling.

First Aid

Have label with you when obtaining treatment advice. Call a poison control center, doctor or 1-800-325-9568 immediately for treatment advice.	
If on Skin or Clothing	• Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes.
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.

Physical or Chemical Hazards

Flammable. Contents under pressure. Keep away from heat, sparks and open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

Environmental Hazards

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

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 that are attacking or appear likely to attack humans. This product may not be effective in all situations or prevent all injuries. Do not spray this product on objects, tents or humans; such use has **no** deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. 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 that may have become contaminated with this product.

This product has an effective range of 18 to 25 feet. The canister empties in approximately 5 seconds.

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 below and familiarize yourself with these procedures. If you have not used this product before you should obtain a training can and practice with it until you can perform these activities quickly and accurately. If you test-fire this container make sure the wind is at your back and depress the actuator tab for no more than half a second. Do not test-fire in areas inhabited by bears. After test firing, clean nozzle and can with soap and water to remove residue from the can.

To Arm and Apply: This product is designed for one-handed operation. Place forefinger through hole in handle with thumb on orange safety clip curl. Pull safety clip straight back and off using thumb (Fig. 1). Depress actuator tab for burst of spray (Fig. 2). Aim at face and eyes of bear. Press trigger for 3 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

To Disarm: Replace orange safety clip by firmly pushing with thumb until audible "snap" is heard (Fig. 3). Check to see if safety clip is securely in place. No gap should be visible between the actuator handle and the safety clip.

location has changed

Fig. 1 **Fig. 2** **Fig. 3**

Storage and Disposal

Storage: Store in a cool, dry place inaccessible to children and pets. Do not store in places where the temperature may exceed 120°F.
Disposal: When container is empty, press valve to release all pressure. Replace safety clip, wrap container and discard in trash. Do not incinerate or puncture.

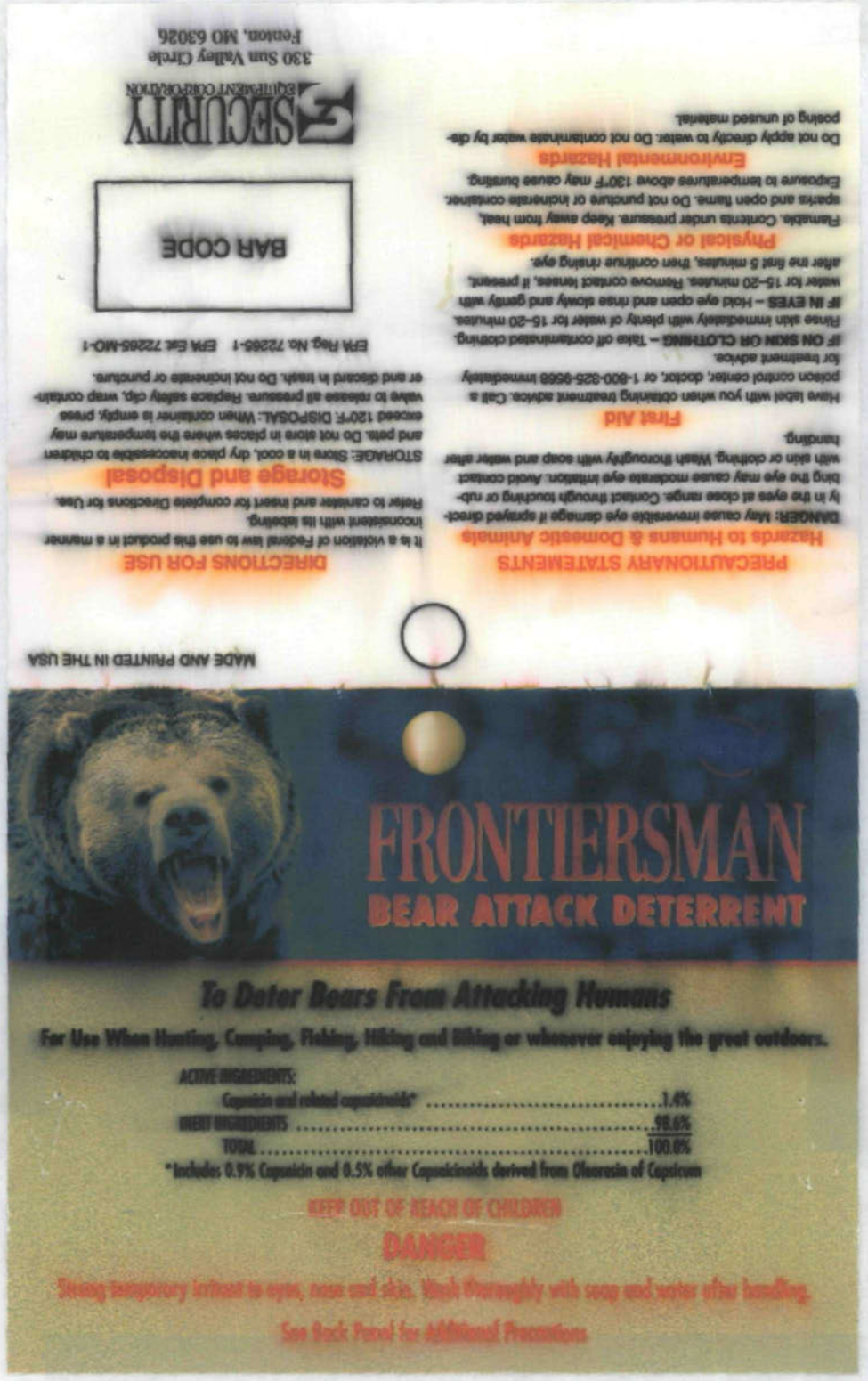
EPA Reg. No. 72265-1 **EPA Est. 72265-MO-1**

SECURITY EQUIPMENT CORPORATION
330 Sun Valley Circle
Fenton, MO 63026

Do not Stamp

in OPP/RD/IRB received 6/20/2000 as part of final printed label

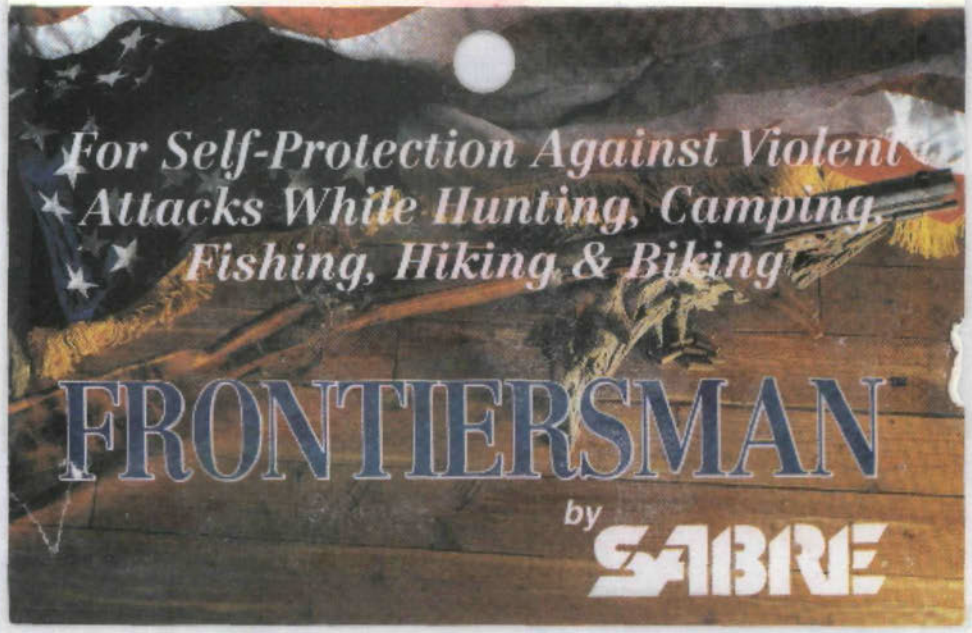
Hang Tag Label (covering "Frontiersman by Sabre" hang tag label)



Do not Stamp

received 6/20/2000
in OPP/RD/IRB

Hang Tag Label
(covered by
"Frontiersman Bear
Attack Deterrent"
hang tag label)



WHAT DOES SABRE FRONTIERSMAN DO?

Frontiersman incapacitates the attacker from 10 to 15 minutes or longer. The effects are immediate-severe burning sensation in the eyes with copious tears, coughing, and difficulty in breathing. The eyes close involuntarily, the nose runs, and moist skin stings. One shot to the face causes instant panic and physical agony.

WHEN TO USE SABRE FRONTIERSMAN

It is recommended that the Frontiersman Pepper Spray be carried in hand when hunting, camping, fishing, hiking, or whenever enjoying the great outdoors. **AFTER SPRAYING THE ATTACKER, ESCAPE IMMEDIATELY AND CALL POLICE. DO NOT TRY TO CAPTURE ATTACKER.**

HOW TO USE SABRE FRONTIERSMAN

Remove orange safety tab. Point the unit at the attacker's face and press the actuator. A heavy spray of powerful protection will discharge from the actuator in a range of 6 to 20 feet. To stop firing release thumb pressure. It's practical, positive protection. Test fire periodically to check performance of your weapon. It is the consumer's responsibility to keep unit from accidentally firing. Do not spray into the wind.

Contains 15% Oleoresin Capsicum (Red Pepper). Do not puncture or incinerate can. Do not expose to heat or store above 120°F. Each canister states expiration date. **AVOID CONTACT WITH SKIN AND EYES.** *In case of skin contact, wash skin with soap and cold water, repeat as necessary. Do not rub, or use creams, salves, or oils. In case of eye contact, flush with cold water for 15 minutes or longer. Expose to fresh air. Get prompt medical attention. Keep out of reach of children. For self-defense only. Not for sale where prohibited by law.*

Dan Peacock on 06/27/2000 02:53:04 PM

To: Bill Jacobs/DC/USEPA/US@EPA
cc:
Subject: Security Equipment Corporation

---------- Forwarded by Dan Peacock/DC/USEPA/US on 06/27/2000 02:52 PM ----------

REGWESTCO@aol.com on 06/26/2000 11:20:41 AM

To: Dan Peacock/DC/USEPA/US@EPA
cc:
Subject: Security Equipment Corporation

Dan,
Thanks for your telephone message. I just got off the phone with Mr. Nance of Security Equipment Corporation. The human repellent product (all marketed under the brand name Sabre, Sabre Defense or Sabre Red) are sold in the following sizes:

For the law enforcement community, they have an 11 oz., a 4.4 oz., a 2.5 oz. and a 1.8 oz. These units are sold primarily through small police supply distributors and small army/navy stores.
For the average consumer, the sizes of Sabre are 14 gm, 15, gm, 22 gm, 35 gm, 60 gm, 80 gm and 110 gm. These are primarily sold in gun shops and small army/navy stores.

As you know, the only size Frontiersman will be sold is 9.2 oz.

Please let me know if you need anything else.

Kim Davis, RegWest Company

IRB BRANCH REVIEW - TSS

Record Number(s)

D266959

IN 6/26/00 OUT 7/11/00

EFFICACY

FILE OR REG. NO. 72265-R

PETITION OR EXP. PERMIT NO.

DATE DIV. RECEIVED 6/20/00

DATE OF SUBMISSION 6/19/00

DATE SUBMISSION ACCEPTED 6/26/00

TYPE PRODUCTS(S): I, D, H, F, N, X, S

DATA ACCESSION NO(S). no new efficacy-related data

PRODUCT MGR. NO. 04

PRODUCT NAME(S) FRONTIERSMAN BEAR ATTACK DETERRENT

COMPANY NAME Security Equipment Corporation

SUBMISSION PURPOSE registration

CHEMICAL & FORMULATION 1.4% Capsaicin and related capsaicinoids aerosol

Efficacy Review: FRONTIERSMAN BEAR ATTACK DETERRENT, 72265-R
Security Equipment Corporation
Fenton, MO 63026

200.0 INTRODUCTION

200.1 Uses

A 1.4% "Capsaicin and related capsaicinoids" aerosol product proposed for Federal registration for use at unspecified sites

> **"only to deter bears which are attacking or appear likely to attack humans"**.

Proposed labels declare this product to be nominally 0.9% Capsaicin and 0.5% "other capsaicinoids".

200.2 Background Information

See efficacy reviews of 6/30/99, 11/9/99, 11/30/99, 1/21/00, 3/29/00, and 5/31/00, along with the enforcement-case efficacy reviews of 2/7/00 and 3/15/00, which pertained primarily to unregistered products produced by Security. The first of the efficacy reviews for this product discussed the initial application for Federal registration of Frontiersman. The second discussed follow-up submissions and accounts of incidents in which people who used products called "Frontiersman" were mauled by bears nevertheless. The third review for 72265-R discussed whether reported differences between the "*OLD FORMULATION*" and the "*NEW FORMULATION*" shown on a "***CONFIDENTIAL FORMULATION COMPARISON***" included in Security's agent's submission of 10/22/99 might have accounted for two Frontiersman incidents of which we had been made aware and also might have indicated that the formulation had been improved. The fourth efficacy review discussed Security's representations to the effect that the "*OLD FORMULATION*" actually corresponded to the composition of the "Frontiersman" product (a.k.a. the never-registered "Frontiersman by Sabre") and the "*NEW FORMULATION*" is what is being proposed for "Frontiersman Bear Attack Deterrent" (72265-R). The two enforcement-case efficacy reviews were mainly concerned with "Frontiersman by Sabre" and the similar product "Alaska's Best Defense". The fifth efficacy review responded to written comments from the applicant's agent, reassessed the spray pattern data previously reviewed, and noted the absence of data on the number of one-second bursts of product that the container would deliver and the lack of revised proposed labeling amended in response to our prior comments. The sixth efficacy review discussed labeling and data submitted on 3/10/00. That review settled the issue regarding duration of firing claim (at "**approximately 5 seconds**") and indicated the remaining changes to labeling that I felt to be necessary prior to registration.

This review discusses a submission of 6/19/00 from Security's agent Kim Davis of RegWest Company, Greeley, CO. Davis indicates that her letter is a response to EPA's letter of 6/5/00. Enclosures provided with Davis's letter of 6/19/00 include "Two market samples (empty canisters)", an amendment form, and an assortment of revised proposed labeling. Such labeling includes typed sheets for the "Aerosol Container", an "Insert", and a "Holster Unit Hang Tag". Additional labeling (printed versions of the same items) were included on and with the "Two market samples (empty canisters)". As his letter of 6/5/00, IRB's Daniel Peacock requested that Security submit "final printed labeling", evidently in an effort to help the company get to the market quickly should that labeling be suitable for acceptance. To create "final printed labeling" for Security, Peacock removed and copied labeling from one of the "market samples". In the process, he discovered that the hang-tag labels were pasted over hang tags that had been used

for "Frontiersman by Sabre®"; the product associated with the two bear attacks that I have discussed in several prior reviews. Peacock has asked me to concentrate on the content of the labels taken from the "market samples" rather than the typed labels.

201.0 DATA SUMMARY

No new efficacy data were submitted.

In the efficacy review of 5/31/00, I commented that the following previously proposed promotional claims were unsupported and/or unwarranted and had to be deleted: "**"Shotgun" Blast Spray Pattern**" and "**Equally Effective in Extreme Temperatures (40° to 120°F)**". Due to its being unsupported as to efficacy and human safety, I also indicated that the claim "**Holster Permits Immediate Firing From Hip**" had to be deleted. The labeling submitted on 6/19/00 lacks these claims.

Of the promotional claims which remained, two -- "**Glow-in-the-Dark Safety Cap**" and "**Will Not Freeze**" -- are objectionable. I see nothing in the "market samples" which appears to be a "**Safety Cap**". The orange clip which serves to block accidental depression of the trigger is not a "cap" and, in any event, failed to glow in the dark today (7/11/00) when I held it up to a fluorescent light for several seconds and then took it into a dark, windowless room. (Peacock witnessed the test.)

In her letter of 7/11/00, Davis states

> We agree to submit the following additional chemistry data on our formulated product within 15 months of registration:
> 1. storage stability
> 2. corrosion characteristics
> 3. freezing and flash point

I feet that, regardless of what one might infer from ingredients and pressurizing, a product for which freezing-point data are lacking should not be labeled with the claim "**Will Not Freeze**".

I have reviewed the proposed labeling for claims, use directions, and anything else relevant to efficacy. My specific comments on the revised proposed labeling appear under "CONCLUSIONS".

[Questions for Dan Peacock: Under "**First Aid**", why is the "**IF ON SKIN OR CLOTHING**" situation before mentioning "**IF IN EYES**"? Why is there no mention of respiratory hazards?]

202.0 CONCLUSIONS

1. Make the changes indicated below, to the proposed container label that was submitted on June 19, 2000.

   a. Delete the promotional claims "**Glow-in-the-Dark Safety Cap**" and "**Will Not Freeze**". We are still awaiting freezing-point data for this product. We found nothing in the "market samples" that you submitted which appears to be a "**Safety Cap**". The orange clip which serves to block accidental depression of the trigger is not a "cap". It also failed to glow in the dark when we tested it for that property.

b. Insert a comma between "before" and "you" in the third sentence of the first paragraph of the "**APPLICATION DIRECTIONS:**" subsection of the "**DIRECTIONS FOR USE**". In the fourth sentence of the same paragraph, insert a comma between "container" and "wind".

2. Make the changes indicated below, to the proposed container label that was submitted on June 19, 2000.

   a. Insert a comma between "before" and "you" in the third sentence of the first paragraph of the "**APPLICATION DIRECTIONS:**" subsection of the "**DIRECTIONS FOR USE**". In the fourth sentence of the same paragraph, insert a comma between "container" and "wind".

William W. Jacobs
Biologist
Insecticide-Rodenticide Branch
July 11, 2000

DP BARCODE: D266959

CASE: 064803 DATA PACKAGE RECORD DATE: 06/26/00
SUBMISSION: S581328 BEAN SHEET Page 1 of 1

* * * CASE/SUBMISSION INFORMATION * * *

CASE TYPE: REGISTRATION ACTION: 166 RESB NEW PRO-OC-MIN CHG
RANKING : 10 POINTS ()
CHEMICALS: 070701 Capsaicin (in oleoresin of capsicum) 1.3880%

ID#: 072265-R Frontiersman Bear Attack Deterrent
COMPANY: 072265 SECURITY EQUIPMENT CORPORATION
PRODUCT MANAGER: 04 TINA LEVINE 703-308-7055 ROOM: CM2 219
PM TEAM REVIEWER: DANIEL PEACOCK 703-305-5407 ROOM: CM2 221
RECEIVED DATE: 06/20/00 DUE OUT DATE: 12/27/00

* * * DATA PACKAGE INFORMATION * * *

DP BARCODE: 266959 EXPEDITE: N DATE SENT: 06/26/00 DATE RET.: / /
CHEMICAL: 070701 Capsaicin (in oleoresin of capsicum)
DP TYPE: 001
CSF: Y LABEL: Y

ASSIGNED TO	DATE IN	DATE OUT	ADMIN DUE DATE: 11/23/00
DIV : RD	/ /	/ /	NEGOT DATE: / /
BRAN: IRB	/ /	/ /	PROJ DATE: / /
SECT: PM04	/ /	/ /	
REVR : [illegible]	6/26/00	7/11/00	
CONTR:	/ /	/ /	

* * * DATA REVIEW INSTRUCTIONS * * *

Bill,

Please review the "final printed label" submitted 6/19/2000 for this product. This is 1 of 2 actions that I hope you can complete by Wednesday, 7/5/2000. See my attached E-Mail of 6/26/2000.

Dan Peacock
703-305-5407

* * * DATA PACKAGE EVALUATION * * *

No evaluation is written for this data package

* * * ADDITIONAL DATA PACKAGES FOR THIS SUBMISSION * * *

DP BC	BRANCH/SECTION	DATE OUT	DUE BACK	INS	CSF	LABEL

enforcement sensitive
DEP

Dan Peacock on 06/26/2000 07:14:59 AM

To: Bill Jacobs/DC/USEPA/US,
cc:
Subject: 2 Highl Priority Items

Bill,

I know that you will be busy the next few weeks so I wanted to share with you my highest 2 priorities. If possible I need them by Wednesday week, July 5:

1. Rozol Ground Spray Label

I sent an electronic copy last Thursday of my proposed, revised label, which I sent to you, 4 states, and SRRD. I will follow-up with a bean and copy of the current label. I must get the final version to LiphaTech by 7/15/2000.

The main part of the label that I wanted you to concentrate on was the use directions. Feel free to talk to the company or anyone else to get the best instructions.

I have discussed the appropriate precautionary statements (including protective clothing) in detail with Bill Erickson, John Redden, and George Tompkins.

2. Frontiersman Bear Attack Deterrent, 72265-R

I have drafted the letter. I only labeling issue that I found was the Co's addition of an expiration date. I like the idea but proposed changes in 2 areas:

a. I proposed a location on the labeling that was prominent, as the regs require and

b. I retained the wording in the regs but modified portions of the text to guide the user to proper disposal instructions.

Note: I discovered that the proposed hang tag label had been glued to an older version of a label "For Self-Protection Against Violent Attacks While Hunting, Camping, Fishing, Hiking & Biking," the type of labeling that Region 7 is thinking about taking action. I raised three interesting questions:

1. Would this information about the sticker hand tag be of use to Region 7?
2. Is the company going to re-sticker existing stock?
3. If so, is the company going to sell product with the approved formula or the earlier unapproved formula that had been implicated in prior bear incidents. As I recall, the co sent us a comparison of the old and new formula, but I do not remember if they have already switched formulas.

Dan Peacock

American Consultants League

RegWest Company

P.O. Box 2220 Greeley, CO 80632-2220 970/353-0611 FAX 970/353-0613

FedEx
AB 8157 7198 4909

June 19, 2000

Office of Pesticide Programs
Document Processing Desk - *7504C*
U.S. Environmental Protection Agency
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202-4501

ATTN: Dan Peacock, Insecticide/Rodenticide Branch

Dear Mr. Peacock:

SUBJECT: Security Equipment Corporation
Frontiersman® Bear Attack Deterrent
EPA File Symbol: 72265-R
Your Letter Dated June 5, 2000

On behalf of its client ***Security Equipment Corporation***, RegWest Company is responding to your letter of June 5, 2000 in continuing support of subject product's FIFRA Section 3(c)(3)(b)(i) pesticide product registration. RegWest Company will act as sole agent in this endeavor.

Attached and/or enclosed are the following items:

1. Application for Pesticide: Other [OPP IDN 256140]
2. Five copies of revised draft labeling
3. Two market samples (empty canisters)

In response to your letter:

We agree to have the following additional chemistry data on the source product submitted within 15 months of registration:
1. description of materials used to produce the product
2. discussion of formation of impurities, if any, in the manufacturing process
3. confidential statement of formula showing certified limits of the active ingredient.

This information, because it is confidential business information of our supplier's, will be submitted directly to the Agency by the supplier on Security Equipment Corporation's behalf.

We agree to submit the following additional chemistry data on our formulated product within 15 months of registration:
1. storage stability
2. corrosion characteristics
3. freezing point and flash point

We have made the requested labeling changes. The changes appear on the draft labeling as well as on the sample market labeling submitted herewith.

We have noted the 6(a)(2) reporting requirements and will, once registration is achieved, comply with these regulations.

Thank you for commenting on the proposed research protocol. We have noted your comments and will take them under consideration.

We believe satisfactory measures to distinguish this product from the human deterrent product have been made. However, we will continue to monitor these measures and include additional aspects in the future, if warranted.

Please contact me at (970) 353-0611 or at regwestco@aol.com if you need additional information or wish to discuss the contents of this letter.

Regards,
RegWest Company

Kim Davis, CC, APC
Consultant/Agent

Attachments
Enclosures

pc: SEC - Nance, L.

Asked Kim in 6/24/2000 phone call to have registrant send us (directly or indirectly) an E-mail, indicating what sizes the human deterrent product will be marketed in. I indicated that this question was an outstanding issue for us. DRP 6/24/2000

Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060. Approval Expires 05/31/98

United States **Environmental Protection Agency** 401 M Street, S.W. Washington, DC 20460-0001	☐ Registration ☐ Amendment ■ Other	OPP Identifier Number **256140**

Application for Pesticide – Section I

1. Company/Product Number **EPA File Symbol: 72265-R**	2. EPA Product Manager **Daniel Peacock**	3. Proposed Classification ■ None ☐ Restricted
4. Company/ Product (Name) **Frontiersman® Bear Attack Deterrent**	PM #	
5. Name and Address of Applicant (*Include ZIP Code*) **SECURITY EQUIPMENT CORPORATION c/o RegWest Company P.O. Box 2220 Greeley, CO 80632-2220** ☐ *Check if this is a new address*	**6. Expedited Review.** In accordance with FIFRA Section 3(c)(3)(b)(i) my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section – II

☐ Amendment – Explain below.	☐ Final printed labels in response to Agency letter dated _____
■ Resubmission in response to Agency letter dated **June 5, 2000**	☐ "Me Too" Application.
☐ Notification – Explain below.	☐ Other – Explain below.

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

Section – III

1. Material This Product Will Be Packaged In:

Child Resistant Packaging	Unit Packaging		Water Soluble Packaging		2. Type of Container
☐ Yes*	☐ Yes		☐ Yes		☐ Metal
☐ No	☐ No		☐ No		☐ Plastic
***Certification must be submitted**	If "Yes" Unit Packaging Wgt.	No. Per Container	If "Yes" Packaging Wgt.	No. Per Container	☐ Glass ☐ Paper ☐ Other (Specify): _____

3. Location of Net Contents Information	4. Size(s) Retail Container	5. Location of Label Directions
☐ Label ☐ Container		☐ On Label ☐ On Labeling Accompanying Product

6. Manner in Which Label is Affixed to Product ☐ Lithograph ☐ Stenciled ☐ Paper glued ☐ Other _____

Section - IV

1. Contact Point (*Complete items directly below for identification of individual to be contacted, if necessary, to process this application.*

Name	Title	Telephone No. (Include Area Code)
Kim Davis, CC, APC	**Consultant/Agent**	**(970) 353-0611**

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

6. Date Application Received **(Stamped)**

2. Signature	3. Title	
	Consultant/Agent	
4. Typed Name **Kim Davis, CC, APC**	5. Date **June 19, 2000**	

EPA Form 8570-1 (Rev. 8-94) Previous editions are obsolete.

Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060.

EPA

United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☐ Other

OPP Identifier Number
256140

Application for Pesticide - Section I

1. Company/Product Number	2. EPA Product Manager	3. Proposed Classification
4. Company/Product (Name)	PM#	☐ None ☐ Restricted
5. Name and Address of Applicant *(Include ZIP Code)* ☐ *Check if this is a new address*	6. **Expedited Review.** In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

☐ Amendment - Explain below.
☐ Resubmission in response to Agency letter dated _____
☐ Notification - Explain below.
☐ Final printed labels in response to Agency letter dated _____
☐ "Me Too" Application.
☐ Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging	Unit Packaging	Water Soluble Packaging	2. Type of Container
☐ Yes* ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Metal ☐ Plastic ☐ Glass ☐ Paper ☐ Other (Specify) _____
Certification must be submitted	If "Yes" Unit Packaging wgt. / No. per container	If "Yes" Package wgt / No. per container	

3. Location of Net Contents Information	4. Size(s) Retail Container	5. Location of Label Directions
☐ Label ☐ Container		☐ On Label ☐ On Labeling accompanying product

6. Manner in Which Label is Affixed to Product ☐ Lithograph ☐ Paper glued ☐ Stenciled ☐ Other _____

Section - IV

1. Contact Point *(Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)*

Name	Title	Telephone No. (Include Area Code)

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

6. Date Application Received (Stamped)

2. Signature	3. Title
4. Typed Name	5. Date

EPA Form 8570-1 (Rev. 8-94) Previous editions are obsolete. White - EPA File Copy (original) Yellow - Applicant Copy

PAPERWORK REDUCTION ACT NOTICE and INSTRUCTIONS

PAPERWORK REDUCTION ACT NOTICE: Public reporting burden for this collection of information is estimated to average 0.85 hour per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to Chief, Information Policy Branch, (2136), U.S. Environmental Protection Agency, 401 M Street, SW, Washington, DC 20460.

INSTRUCTIONS: This form is to be used for all applications for new registration, end use reregistration, amendment, resubmission, to applications for notifications, final printed labeling, reregistration, etc. In order to process an application for a new registration submitted on this form, the following material must accompany the application:

1. Certification with Respect to Citation of Data (EPA Form 8570-29). [If not exempted by 40 CFR 152.81 (b) (4)];
2. Confidential Statement of Formula (EPA Form 8570-4);
3. Formulator's Exemption Statement (EPA Form 8570-27);
4. Five copies of draft labeling;
5. Three copies of any data submitted;
6. Authorization letter where applicable;
7. Matrices where applicable.

Submission of Labeling - Labeling should first be submitted in the form of draft labels with all applications for new registration. Such draft labels may be in the form of typed label text on 8.5 x 11 inch paper for submission or a mockup of the proposed label. If prepared for mockup, it should be constructed in a way as to facilitate storage in an 8.5 x 11 inch file. Mockup labels significantly smaller than 8.5 x 11 inches should be mounted on 8.5 x 11 inch paper for submission.
Submission of Data - Data submitted in support of this application must be submitted in accordance with PR Notice 86-5.

SPECIFIC INSTRUCTIONS: Please read the instructions listed below before completing this application. First determine the type of registration action, listed in Block A, for which you are submitting this application. For applications submitted in connection with New Registration actions, Sections I, III, and IV must be completed by the applicant. For applications submitted in connection with amended reregistration actions, resubmissions, notifications, reregistrations, etc., Sections I, II, and IV must be completed by the applicant.
Block A - Check the appropriate action for which you are submitting this form.

SECTION I - This section must be completed, as applicable, for all registration actions.

1. **Company/Product Number** - Insert your Company Number, if one has been assigned by EPA. This number may have been assigned to you as a basic registrant, a distributor, or as an establishment. If your product is registered, insert the Product Number.
2. **EPA Product Manager** - If known, fill in the name and PM number of the EPA Product Manager.
3. **Proposed Classification** - Specify the proposed classification of this product.
4. **Product Name** - Enter the complete product name of this pesticide as it will appear on the label. The name must be specific to this product only. Duplication of names is not permitted among products of the same company. Do not include any brand name or company line designations.
5. **Name and Address of Applicant** - The name of the firm or person and address shown in your application is the person or firm to whom the registration will be issued. If you are acting in behalf of another party, you must submit authorization from that party to act for them in registration matters. An applicant not residing in the United States must have an authorized agent residing in the United States to act for them in all registration matters. The name and complete mailing address of such an agent must accompany this application.
6. **Expedited Review** - FIFRA section 3 (c) 3 (B) provides for expedited review of applications for registration, or amendments to existing registrations that are similar or identical to other pesticide products that are currently registered with the EPA. In order for your application to be eligible for expedited review, you must provide us with the EPA Registration Number and product name of the product you believe is similar to or identical to your product. The product must be similar or identical in both formulation and labeled uses.

SECTION II - This section must be completed for all applications submitted to amend the registration only of a currently registered product (Amendment), for a resubmission in response to an Agency letter, for notifications to the Agency, for the submission of final printed labeling, for reregistration and for any other action that pertains to a specific EPA-registered product. This section is not to be used for a new application for registration.

1. **Subject of submission** - Check the applicable block and provide the Agency letter date if appropriate. Provide a brief explanation of the purpose(s) for the submission, such as "the addition of a site, pest or crop (specify)"; "amend the Confidential Statement of Formula by..."; "reregistration submission"; "general label revision of use directions." Attach a separate page if additional space is needed.

SECTION III (Packaging and Container Information) - This Section must be completed for all applications submitted in connection with new registration or applicable amendments.

1. **Type of Packaging** - Check the appropriate block if your product will be packaged in the indicated packaging types. Indicate the size of the individual packets and number per retail container.
2. **Type of Retail Container** - Indicate type of container in which product will be marketed.
3. **Location of Net Contents** - Indicate the location of the net contents information for your product.
4. **Size(s) of Retail Container** - Specify the net contents of all retail containers for your product.
5. **Location of Use Directions** - Indicate the location of the use directions for your product.
6. **Manner in which label is affixed to product** - Indicated the method product label is attached to retail container.

SECTION IV (Contact Point) - This Section must be completed for all applications for Registration actions, i.e., new products registration, resubmission, "me-too," reregistration, etc.

1-5. Self-explanatory.
6. EPA Use Only.

Dan Peacock on 06/27/2000 03:55:07 PM

To: Judith Sturgess/ARTD/R7/USEPA/US@EPA
cc: Bill Jacobs/DC/USEPA/US@EPA
Subject: Re: Bear Repellents

Status of Requested Information

I sent the information in our files yesterday about 2 incidents with Frontiersman and the proposed label stickered over an old hang tag label.

Registrants target the bear-deterrent market

There is no question that the product targets the bear-deterrent market, not the human-deterrent market. A picture is worthy a 1000 words. Talk to the persons involved in the bear incidents, bear biologists, or bear interest groups, of which I have a list.

Retailers target the bear-deterrent market

There is also no question that certain retailers are pushing the product as a bear-deterrent. Talk to retailers (on an undercover basis).

Request for Teleconference

I still think that a telephone conference, after looking at the material that I sent you, would be useful in understanding each other's positions. We don't want to send a signal that marketing such products are acceptable.

Alternative to Action Against Registrant

If the Region still does not think that they could sustain a case against the manufacturer, then you should seriously consider going after the retailers. According to other registrants, many retailers tell them that enforcement has no backbone and that they will continue to sell unregistered product until enforcement gets serious.

Extent of Undercover Buys

As I indicated before, because word travels fast in this industry, the message would get out very quickly after a couple busts.

Headquarters Enforcement Guidance to the Regional Enforcement

In April 1999 OECA sent enforcement guidance to the regions concerning unregistered bear sprays. In that guidance, it stated that:

> All dealers who have been inspected or notified in writing found selling and distributing any unregistered bear repellent product(s) after December 31, 1999 would be subject to SSURO's and additional enforcementt action.

Headquarters OPP's Enforcement Policy on Bear Sprays

Later, Marcia Mulkey sent a letter to the appropriate regions to reaffirms OPP's support of OECA's Enforcement Guidance, a section of which stated:

EPA's Current Policy

The object of EPA's current policy is to bring bear repellents into compliance with FIFRA. Such compliance will lead to the adoption of appropriate labeling, which is expected to reduce the risk of death or serious injury resulting from encounters between humans and bears in the United States. EPA is working to achieve this objective by expediting the review of registration applications for bear repellents, initiating enforcement action against manufacturers of unregistered bear repellents, and initiating consumer education on the importance of registered products.

The Agency strongly believes that continued marketing of unregistered products, when registered alternatives are available, poses both potential for unreasonable risks to consumers of such products and creates an "uneven playing field" in the marketplace. Because unregistered bear repellents may not meet the same labeling, safety, efficacy and environmental standards that registered products do, using these products could result in death or serious injury of humans and
in the needless subsequent destruction of "problem" bears by lethal means. For example, containers of spray products primarily used to deter human attacks which contain 1.5 oz of product may not have sufficient amount and power for effectiveness against an attacking bear. Also, manufacturers who do not use modern methods of chemical analyses to measure the actual amount of active ingredient cannot ensure proper product consistency and stability. For this type of public health product, EPA's registration process is designed to assure adequate efficacy data (including spray distance, pattern and duration), irritation data, chemistry data, net contents, and labeling.

Recent Issues

Recent newspaper articles have raised a number of issues about which you may be unfamiliar.
Has the Agency issued any new regulations in conjunction with bear repellents? Does EPA believe that some types of bear-deterrent products could be attracting bears? Would it be a good idea to list all ingredients on product labels? How many bear repellent products are currently registered? To answer these and many other questions, I have provided two additional sets of Questions and Answers.

Pursuant to OECA's April 9 enforcement guidance memorandum, I appreciate your efforts to help ensure that unregistered products are removed from the marketplace and that manufacturers who want to register their products contact the Office of Pesticide Programs (OPP) as soon as possible.

Dan Peacock

703-305-5407

Dan Peacock on 06/27/2000 02:55:06 PM

To: Bill Jacobs/DC/USEPA/US@EPA
cc:
Subject: Bear Repellents

---------- Forwarded by Dan Peacock/DC/USEPA/US on 06/27/2000 02:54 PM ----------

From: Judith Sturgess on 06/27/2000 09:30 AM

To: Dan Peacock/DC/USEPA/US@EPA
cc:
Subject: Bear Repellents

I was on annual leave yesterday, so just received your notes and message this morning.

My FAX is 913-551-7065; I would appreciate your sending the documents on injury and anything else you have to support an enforcement action.

I must tell you, however, that the attorney and I met with the Deputy Director, Office of Regional Counsel, and a third attorney, and all are unwilling to go forward with a civil complaint at this time. I will meet with my supervisor today, to recommend we prepare a referral to OECA for enforcement action.

I have searched for administrative law judge decisions which affirmed the need for product registration based solely on "graphic representation" and find none. We would have to prove the company's intent based solely on a picture. There is no other evidence of intent; to the contrary, letters from the company have provided logical defenses--though not acceptable for registration requirements. And a number of ALJ decisions in the past few years have not even recognized CLEAR (in our opinion) rule language.

I hope you're not too disappointed at this turn of events, but if you send me the information, I will make it part of the file. It will certainly strengthen the case, and perhaps HQ attorneys will go with it.

Recent Communication with Region 7 about pending enforcement case Do Not Release "Enforcement Sensitive" DBPeacock 6/26/2000

Dan Peacock on 06/26/2000 11:55:43 AM

To: Judith Sturgess/ARTD/R7/USEPA/US@EPA
cc: Bill Jacobs/DC/USEPA/US@EPA
Subject: Status of Information on 2 Frontiersman Incidents and Recently Received Label on a Labe

Judy,

You recently indicated that you could use the info in our files about past Frontiersman incidents. We have records on two incidents. Today, I am sending you that information (about 15-25 pages), consisting of:

1. record of telephone call with one victim
2. information from Tim Osag, Region 8, on 2nd incident
3. Bill Jacobs reviews of both incidents
4. a letter saying that the company had not heard of the 2 incidents

Also, I am sending you the "final printed label" for the Hang Tag label for the pending "Frontiersman Bear Attack Deterrent" product. The registrant had glued this first label over a 2nd label, which I removed by soaping in warm water. This 2nd label could have been used as a "tight rope" label to sell product as a bear deterrent. It might help your case against the registrant but that's the Region's call.

Let us know if you need anything.

dan Peacock

Dan Peacock on 06/12/2000 07:58:53 AM

To: Judith Sturgess/ARTD/R7/USEPA/US@EPA
cc: Bill Jacobs/DC/USEPA/US@EPA
Subject: Re: Bear Repellents

Judy,

I have two questions for you today.

1. Could you provide me with your telephone and fax number in case I need to contact you?

2. If I receive any complaints about the sale of unregistered Security Equipment Corp. products as bear repellents (and I have received at least one inquiry recently), should I refer them to Region 7, since the manufacturer resides in your region, should I send them to region where the alleged violations are occurring, or should I send them to both Region 7 and to the region where the alleged violations are occurring?

dan peacock
703-305-5407

Tel 913-551-7385

Dan Peacock
06/10/2000 11:05 AM

To: Judith Sturgess/ARTD/R7/USEPA/US@EPA
cc: Lyn Frandsen/R10/USEPA/US@EPA, Tim Osag/ENF/R8/USEPA/US@EPA, Bill Lee/R9/USEPA/US@EPA, Tatum.Tyres@EPA.GOV@EPA, Bill Jacobs/DC/USEPA/US@EPA, Tina Levine/DC/USEPA/US@EPA
Subject: Re: Bear Repellents

Judy,

Subject	Relunctance of Region 7 Attorney to Sanction Pending Enforcement Case against Company and Sellers of Unregistered Bear Deterrents, Frontiersman and Alaska's Best Defense Summary of Strong Evidence for Case, Consequences of Not Proceeding, and Suggested Next Step
Reason for reluntance	EPA is currently basing its case mainly on its interpretation that the labeling's graphics and minimal text implied a pesticidal use pattern of a bear deterrent. The attorney is concerned that a judge would accept the company's alternative interpretation that the product was really only sold as a human deterrent and that the graphics were not related to the actual use pattern.
Strength of evidence	Any registered product has four key elements to its the use pattern, and the suspect products have all of them: 1. list of pests (picture of a huge bear) 2. list of sites (pictures of rugged mountains where bears would be expected) 3. name of active ingredient and percentage (% oleoresin of capsicum, consist with nomenclature used on past unregistered products) 4. use directions (This is vague. However, the product is used for attacks where: a. a large amount of product is used (consistent with bear, not human attacks) b. the threat is from a relatively great distances (12-20 feet, consistent with bear, not human attacks) This is strong evidence on its own. A picture is worth a 1000 words. A product is sold for a purpose. It is not logical that you sell a product to deter humans but display only graphics consist with a product to deter bears.

Other evidence	The following additional evidence is available: 1. **Competitors** would probably be willing to testify that these products have been sold at retail outlets and sports shows as bear repellents. Many would probably say that in the past they had used the same tactic to avoid enforcement and that the company in question is now using the same tactic to bypass registration. Some may be able to produce documents to this effect. They would be happy to cooperate because they want, and deserve, a level playing field.
	2. **Internet distributors** of these products, if asked, will admit in E-Mails that these products are for bear repellency. I have such documentation of a request that I made on 6/9/2000. Regional enforcement could generate the same information.
	3. **Persons who were injured by such products**, some of whom claimed never to have received any compensation for their injuries, would testify that the product or salesman convinced them that such products would be bear repellents.
	4. **EPA agents** could make undercover buys of product at stores selling these products. They walk in and say, Do you have a product to control bears? or they pick up a can of Frontiersman and say what is this product for. If in Example 1 they say "Frontiersman" or in Example 2 they say "bears", you have evidence that the retailer is selling the product as a bear deterrent. A few fines later, the word would travel fast, and you would find retailers returning product as fast as UPS could ship it.
	5. The **company** applied to register Frontiersman in large cans. Why? They wanted to sell a bear repellent. If the company only intended to sell it to deter humans, why bother?.
Consequences for not proceeding with enforcement action	There would be serious negative consequences for not proceeding with this case, which involves willful and widespread disregard for the need for registration. In my opinion, failing to proceed with this enforcement case, in the face of overwhelming evidence that we either currently have or that we could easily generate, sends the entire pesticide industry the unacceptable message that: **EPA finds that the sale of unregistered pesticides using graphics and vague text is acceptable.** That is a message that the Agency cannot afford to send!

Next step	You need to set up an hour long teleconference among the principal players so that the attorney can air his concerns and we can discuss how to address that person's concerns with the best options.

Dan Peacock,
703-305-5407

Bill Jacobs
06/09/2000 08:28 AM

To: Judith Sturgess/ARTD/R7/USEPA/US@EPA
cc: Lyn Frandsen/R10/USEPA/US@EPA, Tim Osag/ENF/R8/USEPA/US@EPA, Bill Lee/R9/USEPA/US@EPA, Tatum.Tyres@EPA.GOV@EPA, Dan Peacock/DC/USEPA/US@EPA
Subject: Bear Repellents

You probably could find an attorney who would be able to argue the case with conviction, understanding certain circumstances that may not have been impressed on the person with whom you have spoken (who might not be the best candidate in any case). These circumstances are: (1) that animal attack repellents are required to be registered as pesticides; (2) that producers of such products had ample reason to be cognizant of that fact, including an aborted enforcement effort in 1993 and a definite registration-and-enforcement effort that began in 1998; (3) that none of the "pepper spray" products on the bear attack deterrent market was registered as a pesticide prior to May of 1998; (4) that Security had knowledge that Frontiersman by Sabre and Alaska's Best Defense were being distributed and used as bear deterrents and has not documented that it made any efforts to discourage such distribution and use; (5) that the use scenarios claimed on the labels for Frontiersman by Sabre and Alaska's Best Defense all applied to situations in which bears might be encountered (i.e., there were no "dark alley" claims); (6) that, while the labels for Frontiersman by Sabre and Alaska's Best Defense did not directly state that bears were the target species, they did not state that humans were either, and the Alaska's Best Defense product's label pictured a bear; (7) that Security offers a number of pepper-spray and mace products which are fairly clearly labeled for use against people (and, therefore, did not need Frontiersman by Sabre and Alaska's Best Defense to cater to that market); and (8) that, for the offense of selling an unregistered pesticide, the facts that the products were labeled so that they appeared to be pesticides with no text that would clearly disqualify them in that regard should be sufficient to prevail (or at least to force modification of the labeling so that all ambiguities are cleared up).

Well before 1999, Security Equipment Corporation knew that Frontiersman by Sabre was being distributed and used as a bear deterrent and knew that the bear market represented a significant proportion (if not all) of the revenue generated by that product. If we were able to lay our hands upon all promotional items related to that product and Alaska's Best Defense, we might well find evidence of more direct promotion of them as bear deterrents, but the company seems to have been fairly cagey in that regard. I suspect that any such caginess was due to knowledge that they were walking a legal tightrope and a feeling that, by referring to the target organism as an "attacker" rather than as a human or nonhuman animal and by picturing a bear rather than claiming one, they could somehow go on without a registration and cater to the bear deterrent market until such time as they could get onto that market legally. Clearly, we cannot have such nonsense going on; especially with reports of product failures and the company's belated admission to the effect that the Frontiersman by Sabre formulation may be too weak to deter bears. If a picture is truly worth a thousand words, then a picture of a bear on a can of pepper spray makes a claim of bear deterrence many times over.

I suspect that the all of the people who actually bought Frontiersman by Sabre or

Alaska's Best Defense with the intent of using the products to foil would-be human attackers would fit comfortably in an elevator (maybe even a telephone booth or a thimble). It might take one or more pro football stadiums to hold those who bought the products for use against bears. It is time to use our common sense and trust that any ALJ hearing a case and presented with contextual evidence also would have common sense. (Recall that a "preponderance of the evidence" is needed to prevail.) If we needed more evidence, we probably could find those who used the product against bears unsuccessfully and quiz them on the circumstances under which they came to select Frontiersman by Sabre.

We recently have received representations to the effect that Security intends to drop the Frontiersman name for its alleged "personal protection" product and use it only for the bear deterrent product which the company hopes to have registered shortly. You might be able to reach some sort of settlement with them, as long as you are approaching them with full confidence that, if they face you in court, they will lose.

---------- Forwarded by Bill Jacobs/DC/USEPA/US on 06/09/2000 07:20 AM ----------

From: Judith Sturgess on 06/08/2000 03:47 PM CDT

To: Lyn Frandsen/R10/USEPA/US@EPA, Tim Osag/ENF/R8/USEPA/US@EPA, Bill Lee/R9/USEPA/US@EPA, tatum.tyres@epa.gov
cc: Bill Jacobs/DC/USEPA/US@EPA, Dan Peacock/DC/USEPA/US@EPA
Subject: Bear Repellents

I am sending this message to all persons addressed in a Dan Peacock 6/4/99 message re the subject, because I need any support or assistance you can provide.

I am working temporarily in pesticides in Region 7 (Kansas City), having spent 17 years in the program up to 1985. My first case is the ALASKA'S BEST DEFENSE and FRONTIERSMAN BEAR ATTACK REPELLENT.

Bill Jacobs provided an outstanding enforcement review on the labeling of this product. Although labeling had no specific pesticidal claims, the packaging has a good-sized picture of a bear, and with use scenarios typical of bear country (hunting, camping, fishing, hiking, and biking), pesticidal claims are implied.

I prepared SSURO and recall actions, and then conferred with Regional Counsel. The attorney doesn't buy off on the implied claim, despite the HQ review and definitions of label and labeling which include "design or graphic representation". He says it would be easily argued that the bear picture merely represents Alaska and the great outdoors, along the same lines taken by the company.

I have searched Westlaw for any decisions which would support registration for graphic representation, but find none. I contacted Mary McDonnell and she can't recall any such cases/decisions. I'm sort of at a dead end here although I believe the case is worthy. I'd appreciate any thoughts you might have on how I might proceed, short of finding another attorney. Thanks.

BRENZOVICH FIREARMS & TRAINING CENTER

SABRE PRODUCTS

P-22-KR Pocket Unit with Key Ring and Clip

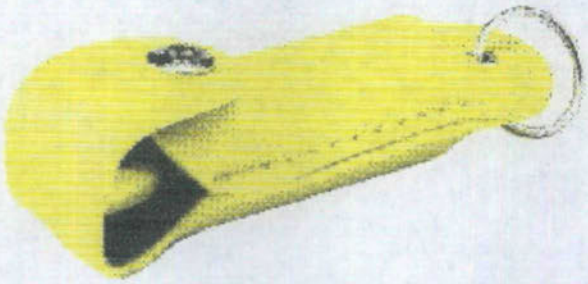
SABRE personal defense weapons feature a unique blend of orthochlorobenzalmalononitrile (CS) Tear Gas and Red Pepper (OC). Developed in the 1950's for military use, CS is quick acting when used in an atomized formulation, and is a severe irritant on the respiratory system. The OC used in SABRE contains capsaicin as the active ingredient. The capsaicin content of SABRE is the hottest available on the market today. CS acts as an irritant, OC as an inflammatory. They make an excellent team.

SABRE RED® contains oleoresin capsicum (OC). OC is a naturally occurring substance derived from certain peppers of the hottest variety. The OC used in SABRE RED® contains 13.2% Capsaicin as the active ingredient. This gives our products up to 2,000,000 Scoville Heat Units, as quality controlled by a High Pressure Liquid Chromatograph (HPLC) test. The Capsaicin content of 13.2% - THE HOTTEST AVAILABLE ON THE MARKET TODAY, provides safe, non-lethal protection.

When SABRE or SABRE RED® comes in contact with the mucous membranes (eyes, nose, and mouth) it causes temporary blindness (through involuntary closing of the eye muscle), inflammation of the respiratory tract, coughing and shortness of breath. Facial skin will feel a stinging, burning sensation. While these effects will seem intense for 10-15 minutes and some discomfort will last up to 45 minutes, they will not cause any permanent harm. Simple washing with soap and cold water and exposure to fresh, moving air removes all effects. REMEMBER - this is a defensive spray - so after use, escape and call the police.

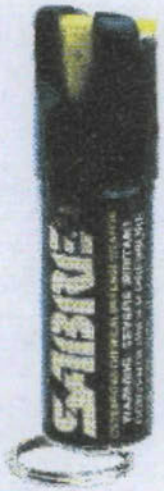
SABRE and SABRE RED units Feature:

- UV-ultraviolet light sensitive dye for police suspect identification
- Highly effective results against individuals under the influence of drugs and/or alcohol
- Inconspicuous, hand-held styles
- Patented Key Case Holsters in a variety of popular colors
- Safety locking tops, with easy operation
- Highest quality manufacturing standards
- Superior formulation
- Propellant is non-flammable, non-ozone depleting, no global warming



SPKC-14

1/2 Ounce Units



KR-14

Product Features:

- Maximum effective range up to 8 feet
- Approximately 35 - 1/2 second sprays

PEN-14 T	Tapered Pen
PEN-14 S	Straight Pen
KR-14	Key Ring
SPKC-14	Pocket Key Case
HC-14	Hard Case
SKPCR-14	Refill Unit

PEN14-T and PEN14-OC

3/4 Ounce Units

Product Features:

- Maximum effective range up to 8 feet
- Approximately 55 - 1/2 second sprays

P-22 Pocket Unit with Clip

P-22

P-22J	Jogger Unit
SHAKCR-22	Home and Auto Key Case
HC-22	Hard Case

P-22J

1 1/4 Ounce Unit

Product Features:

- Maximum effective range up to 10 feet
- Approximately 80 - 1/2 second blasts
- Unit in belt clip holster (Model CM-35) available.

2 Ounce Units

Product Features:

- Maximum effective range up to 12 feet
- Approximately 20 - 1/2 second bursts, law enforcement strength

M-60	Pocket Magnum
BG-M-60PH	Pocket Magnum and Police Holster

3 Ounce Units

Product Features:

- Maximum effective range up to 12 feet
- Approximately 25 - 1/2 second heavy blasts, law enforcement strength

M-80	Professional Magnum
LM-80	Lady Magnum
M-80-FM-OC	Firemaster Magnum
BG-M-80PH	Professional Magnum and Police Holster

4 Ounce Units

Our largest unit, preferred by law enforcement officials, now available for civilian use. Contains law enforcement strength formula.

Product Features:

- Available in two delivery systems - powerful shotgun stream or fogger
- Maximum effective range up to 12 feet
- Approximately 90 - 1/2 second sprays

M-120F Police Magnum Fogger Unit

M-120L Police Magnum Unit

M-120L-OC

HC-40

NEW PRODUCT

Hardcase Units

Hardcase holder with belt clip and breakaway key ring manufactured with Delrim for maximum dimensional stability and corrosion resistance. Two sizes, five colors available. New size now available, HC-22, 3/4 oz unit.

HC-14-OC

All models available in either the SABRE or SABRE RED formulas. Units are individually packaged by either card and blister or clam shell.

SABRE/Red Foam is manufactured exclusively with Oleoresin Capsicum (OC), better known as Red Pepper. The OC used in Sabre/Red Foam contains 13.2% Capsaicin as the active ingredient. This gives Sabre/Red Foam products up to 2,000,000 Scoville Heat Units, the hottest available on the market.

SABRE RED Foam Units Feature:

- 2 oz., 3 oz., and 4 oz. sizes
- Belt clip holster in each size
- Ultraviolet light sensitive dye
- Naturally occurring substance
- Locking safety tops
- Easy operation
- Fast and effective
- No permanent injury

PF-128 4 oz. Pepper Foam Unit

PF-75 3 oz. Pepper Foam Unit

PF-50 2 oz. Pepper Foam Unit

PF-128 Carded unit

Outdoor Deterrents

We offer a line of outdoor spray deterrents, for self-protection against violent attacks while camping, hiking, hunting, biking or fishing.

FRONTIERSMAN® by SABRE

FM-454, FM-260, FM-80

- Firemaster dispensing system for maximum spray pattern
- Three convenient sizes
  FM-454 large
  FM-260 medium
  FM-80 small
- Holsters available for each size
- Maximum effective range 12-20 feet, depending on model

Alaska's Best Defense

- Contains the same great formula as Frontiersman.
- Nylon holsters are also available.
- Available in two sizes:
  - AB-454-OC
  - AB-260-OC

AB-260 Clam

Dealer inquiries invited, Law Enforcement bids encouraged

SABRE PRICES

ITEM	ITEM #	PRICE
Pocket Unit, .79 oz with key ring & clip	P-22KR	$ 9.00
Pocket Key Case, .54oz	SPKC-14	$ 9.00
Key Ring, .54oz	KR-14	$ 7.50
Tapered Pen, .36oz	Pen 14T	$ 8.50
Straight Pen, .36oz	Pen 14OC	$ 8.00
Pocket Unit with Clip, .79oz	P-22	$ 8.00
Jogger Unit, .79oz	P-22J	$10.00
Pocket Magnum, 2oz	M-60	$12.50
Professional Magnum, 2.5oz	M-80	$13.00
Police Magnum Fogger,	M-120F	$15.00

4.4oz		
Police Magnum Unit, 4.4oz	M-120L	$12.00
Hard Case, .54oz	HC-14-OC	$10.00
Hard Case, .4oz	HC-40	$15.00
Pepper Foam, 4oz	PF-128	$19.00
Pepper Foam, 3oz	PF-75	$18.00
Pepper Foam, 2oz	PF-50	$17.00
Frontiersman, large	FM-454	$38.95
Frontiersman, medium	FM-260	$29.95
Frontiersman, small	FM-80	$25.95
Alaska's Best Defense, large	AB-454	$39.95
Alaska's Best Defense, small	AB-260 OC	$29.95

Call for prices, details, and availability.

Brenzovich Firearms and Training Center
Email George & Debbie Brenzovich
Toll Free: 1-877-585-3775 fax orders/quote

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Thursday

From: Judith Sturgess on 06/08/2000 03:47 PM CDT

To: Lyn Frandsen/R10/USEPA/US@EPA, Tim Osag/ENF/R8/USEPA/US@EPA, Bill Lee/R9/USEPA/US@EPA, tatum.tyres@epa.gov

cc: Bill Jacobs/DC/USEPA/US@EPA, Dan Peacock/DC/USEPA/US@EPA

Subject: Bear Repellents

I am sending this message to all persons addressed in a Dan Peacock 6/4/99 message re the subject, because I need any support or assistance you can provide.

I am working temporarily in pesticides in Region 7 (Kansas City), having spent 17 years in the program up to 1985. My first case is the ALASKA'S BEST DEFENSE and FRONTIERSMAN BEAR ATTACK REPELLENT.

Bill Jacobs provided an outstanding enforcement review on the labeling of this product. Although labeling had no specific pesticidal claims, the packaging has a good-sized picture of a bear, and with use scenarios typical of bear country (hunting, camping, fishing, hiking, and biking), pesticidal claims are implied.

I prepared SSURO and recall actions, and then conferred with Regional Counsel. The attorney doesn't buy off on the implied claim, despite the HQ review and definitions of label and labeling which include "design or graphic representation". He says it would be easily argued that the bear picture merely represents Alaska and the great outdoors, along the same lines taken by the company.

I have searched Westlaw for any decisions which would support registration for graphic representation, but find none. I contacted Mary McDonnell and she can't recall any such cases/decisions. I'm sort of at a dead end here although I believe the case is worthy. I'd appreciate any thoughts you might have on how I might proceed, short of finding another attorney. Thanks.

1) Intent of company - applied for registration
2) Complaints from other bear spray users
3) Accidents
~~4) Result of accidents~~
4) website

Sent E-mail to Kathy Rice
to get more info

prob need a HQ rsly & telephone

put with
jacket
for Frontiersman

Dan Peacock on 04/05/2000 01:15:02 PM

To: Rita Kumar/DC/USEPA/US@EPA, Linda Arrington/DC/USEPA/US@EPA, Mcdonnell.Mary@EPA.GOV@EPA, Maryjane Wingett/WWPD/R7/USEPA/US@EPA
cc: Bill Jacobs/DC/USEPA/US@EPA
Subject: Completion of Enforcement Case Review:ECR, FY2000-VII-004

Addressees,

This informs you that Bill Jacobs has finished his review of the above ECR. Today I am sending the file and his review through the normal routing channel, as I know it: Rita, Linda, Mary M. and Mary W.

Please forward it as quickly as possible because Region 7 has an enforcement case pending completion of this ECR.

Thank you,

Dan Peacock
305-5407

From: Maryjane Wingett on 02/23/2000 03:13 PM CST

To: Bill Jacobs/DC/USEPA/US@EPA
cc: Dan Peacock/DC/USEPA/US@EPA, Tina Levine/DC/USEPA/US@EPA
Subject: Region 7's Alaska's Best Defense Pepper Spray File

Bill -- I thought I'd check in to see if you all ever received the complete file for this inspection. If not, then I need to do some backtracking with ORE to see where the file is. I was just trying to draft a Stop Sale, Use, or Removal Order to the company and found it impossible to do without the file. Let me know, please.

Thanks,

Mary Jane Wingett
Bill Jacobs

Bill Jacobs
02/07/00 11:08 AM

To: Maryjane Wingett/WWPD/R7/USEPA/US@EPA
cc: Tina Levine/DC/USEPA/US@EPA, Dan Peacock/DC/USEPA/US@EPA
Subject: Alaska's Best Defense Pepper Spray

Dan Peacock forwarded to me the materials that you FAXed last week as though they were a review item for Security Equipment Corporation's pending application for Frontiersman Bear Deterrent Spray, 72265-R. I have reviewed the materials and have provided answers to your three specific questions. I also have discussed some other relevant items from Security Equipment Corporation of which I have become aware. I understand that a larger package has been sent to OECA. I could not clearly discern pictures of bears on the FAXed copies of labeling that I received, but I indicated in the review what I thought such pictures would mean in terms of claims and pesticidal status. With or without pictures of bears, it is seems from the labeling that use against bears was an intended use for Alaska's Best Defense. There may have been other intended uses as well.

A copy of my review is attached. FRNTRSMN.005.

From: Maryjane Wingett on 04/06/2000 06:44 AM CDT

To: Dan Peacock/DC/USEPA/US@EPA
cc: Bill Jacobs/DC/USEPA/US@EPA, Linda Arrington/DC/USEPA/US@EPA, Mcdonnell.Mary@EPA.GOV, Rita Kumar/DC/USEPA/US@EPA
Subject: Re: Completion of Enforcement Case Review:ECR, FY2000-VII-004

dan -- thanks for the notice that it's on it's way.

Dan Peacock

Dan Peacock
04/05/00 12:15 PM

To: Rita Kumar/DC/USEPA/US@EPA, Linda Arrington/DC/USEPA/US@EPA, Maryjane Wingett/WWPD/R7/USEPA/US@EPA
cc: Bill Jacobs/DC/USEPA/US@EPA
Subject: Completion of Enforcement Case Review:ECR, FY2000-VII-004

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Thank you,

Dan Peacock
305-5407

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330 SUN VALLEY CIRCLE
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6363430200

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US EPA OFFICE OF PEST. REG.
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DBPeacock
305-5407
8/1/2002

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