

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

APR 16 1990

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Mr. T. David Williams, J.D.
Legal/Regulatory Affairs Director
Speer Products, Incorporated
4242 B.F. Goodrich Boulevard
P.O. Box 12993
Memphis, TN 38118

Dear Mr. Williams:

Subject: Final Print Labels
Speer Professional Insect Killer
EPA Registration No. 11715-5

The amendment referred to above, submitted in connection with registration under section 3(c)(7)(A) of the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable provided that you submit labeling revised according to the comments below.

1. Add the following Environmental Hazards block to the label.

"Environmental Hazards

"This product is highly toxic to fish. Drift and runoff from treated sites may be hazardous to fish in adjacent waters. Consult your State's Fish and Wildlife agency before treating such waters."

2. Revise your statement of Practical Treatment by deleting the statement "Consult a physician if irritation persists," and adding the statement "Get medical attention if irritation persists" to the If In Eyes and If On Skin sections.

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CONCURRENCES

SYMBOL							
SURNAME							
DATE							

3. Replace the statements "Food should be removed or covered during treatment. All food processing surfaces should be covered during treatment or thoroughly cleaned before using" with "Food should be removed or covered in such a way as to prevent contamination before treatment. Food contact surfaces and equipment must be washed with an effective cleaning compound followed by a potable water rinse after treatment."
4. Your labeling makes reference to areas that are clearly designated as U.S. Department of Agriculture (USDA) meat and poultry processing plants. You must either:
 - a. File a separate application with USDA to obtain approval in such processing plants, in which case the label wording should be changed to reflect USDA acceptance, or
 - b. Qualify your site designation to exclude USDA meat and poultry processing plants.

You may submit your application to:

Mr. Charles Edwards
Compound Evaluation Laboratory
Scientific Services, FSQS
Food Ingredient Assessment Division
U.S. Department of Agriculture
Building 306, BARC - East
Beltsville, MD 20705
(301) 344-2566

Submit a copy of the approved application to EPA for your file.

Sincerely yours,



Phil Hutton
Product Manager (17)
Insecticide-Rodenticide Branch
Registration Division (H7505C)

ACCEPTED
with COMMENTS
in EPA Letter Dated:

SEP - 6 1990

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide
registered under EPA Reg. No.
11715-5

Precautionary Statements

Hazardous To Humans and Domestic Animals

CAUTION: Harmful if swallowed. Avoid contact with eyes or skin. Cover or remove fish-bowls. Remove all pets from area to be treated. Avoid contamination of food and feedstuff. Food should be removed or covered during treatment. All food processing surfaces should be covered during treatment or thoroughly cleaned before using. When using this product in these areas, apply only when the facility is not in operation. In hospitals, patients should be removed from room prior to treatment. Room should be ventilated for 2 hours after spraying. Do not return patients to room until after ventilation.

PHYSICAL HAZARDS

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

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Call a physician or Poison Control Center. Do not induce vomiting. This product contains petroleum distillate. Aspiration may be a hazard.

IF IN EYES: Flush eyes with plenty of cold water. Consult a physician if irritation persists.

IF INHALED: Remove victim to fresh air.

IF ON SKIN: Wash contaminated skin with soap and water.

SPEER PROFESSIONAL INSECT KILLER

* With 25% S8P - 1382

**For Bakeries, Food Plants, Restaurants,
Schools, Hotels, Motels, Office Buildings,
Hospitals, Food Handling Plants.**

ACTIVE INGREDIENTS

1-(5-Benzyl-3-furyl) methyl 2,2 dimethyl-3 (2-methylpropenyl) cyclopropane carboxylate	0.250% w/w
Related compounds	0.034%
Aromatic petroleum hydrocarbons	0.331%
Petroleum distillate	19.375%
INERT INGREDIENTS	80.010%
	100.000%

* Cis trans isomers ratio: max 30% (+/-) cis and min 70% (+/-) trans

* U.S. Patent No. 3,465,007

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

See Back Panel for Additional Precautionary Statements

Net Weight _____ OZ.

EPA Reg. No. 11715-5

EPA Est. No. 11715 TN 1

Manufactured by
SPEER PRODUCTS, INC.
Memphis, TN 38118

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with the directions on the label. Holding dispense valve in desired direction and push button to spray.

MOSQUITOS, FLIES, GNATS: Do the spray to all parts of the room. Fill the room area. Keep room closed for at least 15-30 min. treatment is completed.

WASPS: Application should be made in late afternoon. Spray liberally into hiding and breeding places possible. Repeat as necessary.

FOR CRAWLING INSECTS: Roaches, spiders and centipedes. Spray thoroughly into cracks, crevices, moist areas, openings, and refrigerators, baseboards and storage areas possible.

ANTS: Spray trails, nests, and points of entry. Repeat as necessary.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed. Storage or disposal.

Storage: Store in cool area away from open flame.

Disposal: Replace cap and seal. Do not puncture or incinerate.