PM- 10

.IAN 6 1992

Mr. T. David Williams Speer Products, Inc. 4242 B.F. Goodrich Blvd. Memphis, TN 38118

Dear Mr. Williams:

Subject: Revised Labeling

Speer Yard and Patio Fogger

EPA Reg. No. 11715-26

Submission dated December 11, 1991

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments listed below. Five copies of the finished labeling must be submitted prior to releasing the product for shipment.

The term "related compounds" should be deleted from the label ingredient declaration. Unless otherwise substantiated, these isomers should be considered inert. It the 'related compounds" are determined to be active, they should be incorporated in the declaration for the active ingredient and not distinguished as "related compounds" or "other isomers". If necessary, submit a revised Confidential Statement of Formula accordingly.

Since your product is not an "abatement" type of product and is strictly for domestic applications, delete the phrase "Consult your state's fish and wildlife Agency before treating such waters". The use of your product will not involve the treatment of waters.

In accordance with 40 CFR part 156.10(h)(2)(i), the signal word "Caution" must appear immediately below the "Hazards to Humans and Domestic Animals" subheading.

We are still awaiting product chemistry and a corrected CSF as specified in the Agency's letter of March 18, 1991.

Sincerely,

Richard F. Mountfort Product Manager (10) Insecticide-Rodenticide Branch Registration Division (H7505C)

Directions for Use

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

Spray outdoor areas of the yard, patio and camp ground when there is no breeze or spraying the direction of a slight breeze.

Controls flies, mosquitoes and gnats up to 12 feet away, using this fog nozzle.

Shake well before using

Point spray nozzle away from the face and in the direction of the space to be treated. Press down valve button and allow spray fog to fill the air where flying pests linger. For larger areas, best results are obtained by spraying in the direction of a slight breeze that allows the fog to drift into the areas of infestation. Spray

while moving away from treated areas. Allow spray to dissipate before occupying the treated area. Repeat as necessary.

FLYING INSECTS - Reduce annoyance from flies, mosquitoes, moths and gnats by directing spray from a distance of 4 to 6 feet from flowering plants, shrubbery and grass to where the insects may be resting. Avoid heavy wetting of plant foliage. Also spray around garbage cans and other breeding areas. Repeat as

necessary

Spray directly on wasps and hornets. Thoroughly wet the nesting area during the evening when these insects are least active.

CRAWLING INSECTS - Spray directly on ants, centipedes, sowbugs, and spiders. Treat areas around garbage cans, picnic sites and camp grounds infested by these pests. Also thoroughly spray ant hills for best results. Spray in short bursts of 2 seconds at a distance of 4 to 6 feet for control of Brown Recluse Spider and Black Widow Spider. Repeat application a necessary.

Storage and Disposal

Dot not contaminate water, food or feed by storage or disposal.

Storage: Store in a cool area away from heat or open flame.

Disposal: Replace cap and discard in trash. Do not puncture or incinerate.

PRECAUTIONARY STATEMENT Hazards to Humans and Domestic Animals

Avoid breathing spray mist. Avoid contact with skin. Allow spray to disperse for several minutes before entering the treated area. Harmful if swallowed. Not for indoor use. Cover food before spraying. Direct spray away from people and animals. Avoid smoking while spraying.
While spraying for flying insects outdoors, hold container 4 to 6 feet away from

plants and shrubs. Direct spray to fill the air around these plants without heavy wetting of plant foliage. Do no spray food crops.

Physical and Chemical Hazards

Contents under pressure. Do not use or store near heat or open flame. Do not

Environmental Hazards

This product is highly toxic to fish. Drift and run off from treated sites may be a COMMENTS hazardous to fish in adjacent waters. Consult your state's fish and wildlife Agency PA Letter SPEER PR

STATEMENT OF PRACTICAL TOTAL TOTAL TOTAL SPEER PR

If an eyes: Flush with plenty of water. Get medical attention if irritation persists and Rodenticide persists.

If on skin: Wash with soap and plenty of water. Get medical attention if irritation is irritation if irritation is irritation in the persists. anded, for the pesticide Tegotired under EPA Reg. No.

SPEER YARD FOGGI

Sprays Up to 1 Contains SB?

Kills Flies, Mosquitoes, Gnats and Ants For Outdoor Use in Yards, Patios and (Ready to use to kill flies, mosquitoes, m ants, spiders, centipedes, and scwbug

SHAKE WELL BEFO

ACTIVE INGREDIENTS:

Resmethrin +*(5-Benzyl-3-furyl)n methylpropenyl)cyclopropane carboxyl Related compounds..... INER' INGREDIENTS:

*Cis/trans isomers ratio:max, 30% (+/-) + U.S. Patent No. 3,465,007.

CAUTIO **KEEP OUT OF REACH** See Additional Precaut

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Manufactured SPEER PRODUCT 4242 B.F. Goodric Memphis, TN 3