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12 JUN 1992

T. David Williams, J.D.
Speer Products, Inc.
4242 B.F. Goodrich Blvd.
Memphis, TN 38181-0993

Dear Mr. Williams:

Subject: Revised Labeling
Speer Indoor-Outdoor Insect Spray, EPA Reg. No. 11715-7
Speer Insecticide, Pyrethrum Space Spray Synergized
Pyrethrin, EPA Reg. No. 11715-46
Submissions dated May 22 and June 5, 1992, respectively

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. One copy of the finished labeling must be submitted prior to releasing the product for shipment.

- 1) Revise your Environmental Hazards statement to read:

"This pesticide is highly toxic to fish. Do not apply directly to water. Drift and runoff from treated sites may be hazardous to fish in adjacent waters."

- 2) Revise the sentences, "All food processing surfaces should be covered. . .before using" and "Food contact surfaces. . with a potable water rinse after treatment", to read:

"All food processing surfaces and equipment should be washed with an effective cleaning compound followed by a potable water rinse."

- 3) For Reg. No. 11715-46, you must submit an updated Confidential Statement of Formula (EPA Form 85,0-4 re. '85).

Sincerely,

RFM

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

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS CAUTION

Harmful if swallowed, inhaled or absorbed through the skin. Avoid prolonged or repeated inhalation of mist. Do not remain in treated areas. Wash thoroughly after using. Avoid contamination of food and foodstuffs. Foods should be removed or covered during treatment. All food processing surfaces should be covered during treatment or thoroughly cleaned before using. When using the product in these areas, apply only when the facility is not in operation.

PHYSICAL OR CHEMICAL HAZARDS

Do not use or store near heat and open flame.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Keep out of lakes, streams, or ponds. Do not contaminate water by cleaning equipment or disposal of wastes. Apply this product only as specified on this label.

STATEMENT OF PRACTICAL TREATMENT

If swallowed: Do not induce vomiting due to aspiration pneumonia hazard. Call a physician or Poison Control Center immediately.

If inhaled: Remove to fresh air.

If on skin: Remove contaminated clothing and wash affected areas with soap and water. Get medical attention if irritation persists.

If in eyes: Flush with plenty of water. Get medical attention if irritation persists.

NOTE TO PHYSICIAN: Contains petroleum distillates. Vomiting may cause aspiration hazard.

SPEER INSECTICIDE, PYRETHRUM SPACE SPRAY SYNERGIZED PYRETHRINS

FOR USE AGAINST FLIES AND MOSQUITOES

ACTIVE INGREDIENTS:

Pyrethrins 0.40%

Piperonyl butoxide, technical* 1.60%

INERT INGREDIENTS: 98.00%
100.00%

*Equivalent to 1.28% (butylcarbitol)(6-propylpiperonyl) ether and 0.32% related compounds.

KEEP OUT OF REACH OF CHILDREN CAUTION

See side panel for additional Precautionary Statements and Statement of Practical Treatment

One U.S. Gallon

Manufactured by:
SPEER PRODUCTS, INC.
4242 B.F. Goodrich Blvd.
Memphis, TN 38118

DIRE

It is a violation of manner inconsistent

To control flies ar into air. Adjust the mist possible. Spr 1000 cubic feet pr all parts of the roo heavily. Keep the remain in treated ment is completed

Remove pets, bir spraying.

STORA

Do not contamina disposal.

Storage: Store in open flame.

Pesticide Dispos this product may approved waste d

Container Dispo Then offer for rec and dispose of in dures approved by

ACCEPT with CODE in EPA Label

12 JUN

Under the Feds Fungicide, and as amended, for registered under 11715

EPA Reg. No. 11715-46

EPA Est. No. 11715-TN-1

BEST AVAILABLE COPY