



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

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

AUG 26 2003

Mr. William L. Washburn  
SPEER Products, Inc.  
P.O. Box 18993  
Memphis, TN 38118-0993

**SUBJECT: Label Amendment Per PR Notices 2001-1 and 2001-6  
SPEER 2% Transparent Emulsion Concentrate  
EPA Reg. No. 11715-68  
Your Applications Dated February 25, 2003**

Dear Mr. Washburn:

The labeling amendments referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, are acceptable subject to the comments below:

1. Based on the signal word "WARNING", revise the Hazards to Humans and Domestic Animals to read as follows:

Causes substantial but temporary eye irritation. Do not get into eyes or on clothing. Wear protective eye (safety glasses). Harmful if swallowed or inhaled. Avoid breathing mist. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse. Do not spray on humans or pets. Do not spray where food or drink is exposed or being consumed.

2. In the FIRST AID box under IF SWALLOWED, correct the spelling of "Have" in the second bullet.
3. Revise the Environmental Hazards statement to read as follows:

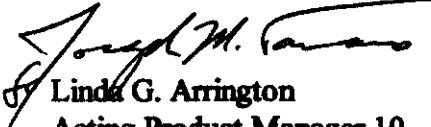
Do not apply directly to water. Do not contaminate water when disposing of equipment washwaters or rinsate.

4. Under DIRECTIONS FOR USE:

- a. You may delete "GENERAL CLASSIFICATION" because it is no longer required to be on the label.
- b. Under APPLICATIONS, you may want to add a comma (,) after "In hospitals in the second sentence. Correct the spelling of "ship" in the third sentence.
- c. In the STORAGE AND DISPOSAL box, include the statement "Do not contaminate water, food, or feed by storage or disposal."
- d. Under WARRANTY STATEMENT, correct the spelling of "guarantee", safe" and "directions" in the second sentence, and the spelling of "including" in the last sentence.

You must submit two (2) final printed label before you release the product for shipment. A stamped copy is enclosed for your records.

Sincerely yours,

  
Linda G. Arrington  
Acting Product Manager 10  
Insecticide Branch  
Registration Division (7505C)

Enclosure

# SPEER 2% TRANSPARENT EMULSION CONCENTRATE

WITH SBP-1382® -  
A SYNTHETIC PYRETHROID  
DUAL ACTION INSECT KILLER

KILLS AS CONTACT AND  
RESIDUAL SPRAY

KILLS ROACHES UP TO 4 WEEKS

## ACTIVE INGREDIENTS:

\*†°Resmethrin: [5-(phenylmethyl)-3-  
furanyl]Methyl-2,2-dimethyl-3-(2-methyl-1-  
propenyl)-  
cyclopropanecarboxylate.....2.00%  
INERT INGREDIENTS:.....98.00%  
100.00%

\*cis/trans isomer ratio: max. 30% (±) cis and  
min. 70% (±) trans

†U.S. Patent No. 3,456,007 and 3,542,928

°Penick's SBP-1382 (R) brand of resmethrin  
insecticide, Penick Corp., 1050 Wall Street West,  
Lyndhurst, NJ 07071

KEEP OUT OF REACH OF CHILDREN

## WARNING

Have Clean Water Supply at Hand In Case of  
an Eye Emergency When Diluting This  
Concentrate

(See Side Panel for Additional  
Precautionary Statements)

NET WEIGHT: \_\_\_\_\_

EPA Reg. No. 11715-68

EPA Est. No. 11715-TN-1

CAN BE USED IN NON-FOOD AREAS OF  
FOOD HANDLING ESTABLISHMENTS

## PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS WARNING

Harmful if swallowed. Avoid contact with skin or  
clothing. Causes eye irritation. Do not get in  
eyes. Wash after handling. Avoid breathing  
vapor. Do not spray on humans or pets. Do not  
spray where food or drink is exposed or being  
consumed.

FIRST AID	
IF SWALLOWED:	<ul style="list-style-type: none"><li>• Call poison control center or doctor immediately for treatment advice.</li><li>• Have person sip a glass of water if able to swallow.</li><li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li><li>• Do not give anything by mouth to an unconscious person.</li></ul>
IF ON SKIN OR CLOTHING:	<ul style="list-style-type: none"><li>• Take off contaminated clothing.</li><li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>

ACCEPTED  
with COMMENTS  
In EPA Letter Dated:

AUG 26 2003

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act,  
as amended, for the pest  
registered under EPA Reg. 11715-68

IF IN EYES:	<ul style="list-style-type: none"><li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li><li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
IF INHALED:	<ul style="list-style-type: none"><li>• Move person to fresh air.</li><li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.</li><li>• Call a poison control center or doctor for further treatment advice.</li></ul>
<b>HOT LINE NUMBER</b> Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-877-757-4943 for emergency medical treatment information.	

## ENVIRONMENTAL HAZARD

Keep out of lakes, streams, or ponds. Do not contaminate water by cleaning of equipment or disposal of wastes. When used on ships do not wash or flush freshly sprayed surfaces into adjacent waters.

## PHYSICAL OR CHEMICAL HAZARD

Do not use, pour, spill, or store near heat or open flame. Flash Point Minimum 140°F.

## DIRECTIONS FOR USE

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

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## GENERAL CLASSIFICATION

Do not use in edible product areas of food processing plants, restaurants, or other areas where food is commercially prepared or processed. Do not use in serving areas while food is exposed. In the home cover or remove exposed foods. Avoid contamination of cooking utensils and food preparation surfaces.

## DIRECTIONS FOR USE—DILUTION INSTRUCTIONS

For an emulsion containing 0.35% SBp-1382-Dilute:

CONCENTRATE FL./OZS.	TO VOLUME BELOW / WATER
1.5	8 fl./ozs.
3	16 fl./ozs.
6	32 fl./ozs.
11.5	Half (½) gallon
23	One (1) gallon

## MIX WELL BEFORE EACH USE.

## APPLICATIONS

**Instructions for contact and residual sprays for indoor use:** In non-food areas of food handling establishments, commercial, industrial, office, residential, public, institutional and storage building, homes, hotels, ship cabins and hospitals. In hospitals patients should be removed prior treatment. Also for use in buses, automobiles, and non-food areas of trucks, boxcars and shop cargo holds. Do not use on electrical equipment or on surfaces that can be harmed or stained by water. Also for use indoors in dog kennels and horse stables. In horse stables, not for application if horses will be used for food.

**CONTACT SPRAY—Kills and Reduces Infestations: Cockroaches, Crickets, Silverfish, Ants:** Apply as a contact spray. Fill spray tank with 0.35% Transparent Emulsion Spray formulation. Keep spray nozzle about 8 to 12

inches from surface to be treated. Adjust pressure and nozzle to deliver a coarse wet spray. When possible, spray directly on pests to reduce infestations. Spray thoroughly into hiding places such as cracks, crevices, moist areas, openings around pipes and sinks, under refrigerators and other appliances, baseboards, and storage areas. Apply spray until area is moist but not to the point of run-off. Spray directly on insects where possible. Repeat as necessary.

## ANTS: To Kill Ants

Spray trails, nests and points of entry within buildings and homes. Spray on ants where possible. Repeat as necessary.

**FLEAS:** Aids in the control of fleas on pet bedding and in horse stalls. Hold spray nozzle about 18 inches from areas to be treated. Direct spray on resting areas and floor around these areas. Apply spray until area is moist. Treat pet bedding the same way. Also spray entire inside surface of dog houses. Repeat as necessary. Do not allow pets to contact treated areas until spray has dried. Remove or cover animal feed before spraying. Also, treat dogs, cats, and horses with a registered flea control product before they re-enter the treated area.

**RESIDUAL SPRAY: Aids in the control of cockroaches, Crickets, Silverfish, Ants. Kills for up to 4 weeks:** Spray baseboards, cracks, and crevices, around door and window frames, and other hiding places such as closets, in back of and under appliances, sinks and cupboards in kitchens and bathrooms. In basements, spray hiding places in cracks and crevices, lower walls and dark places. Apply as a coarse wet spray in a 4 to 6 inch band until area is thoroughly wet but not to point of run-off. Repeat as necessary.

## STORAGE AND DISPOSAL

**STORAGE:** Store at temperatures above 32° F.

**DISPOSAL:** If empty: Do not reuse this container. Place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

## WARRANTY STATEMENT

Our recommendations for use of this product are based upon tests believed to be reliable. The use of this product being beyond the control of the manufacturer, no guarantee, expressed or implied, is made as to the effects of such or the results to be obtained if not used in accordance with directions or established sale practice. The buyer must assume all responsibility, including injury or damage, resulting from its misuse as such, or in combination with other materials.

[Distributors may choose to use their own emergency numbers and times of operation]

**MANUFACTURED BY:  
SPEER PRODUCTS, INC.  
P.O. BOX 18993  
MEMPHIS, TN 38118-0993**

Netserver/Reg/SP1labels-11715-68-NOTIF-2001-1&6-(2-20-03)

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