MAR 2 0 1991

Mr. David Williams
Speer Products, Inc.
4242 B.F. Grodrich boulevard
P.O. Box 18993
Memphis, TN 38181-0993

Dear Mr. Williams:

Subject: Speer Automatic Indoor Foyger
EPA Registration No. 11715-71
Your Letter Dated September 5, 1988

The proposed amendment to the registration of the product cited above, removing the ingredient methylene chloride from the formulation, is acceptable subject to the comments listed below.

- 1. Delete the term "General Classification" from the label.
- The petroleum distillate should be declared as an inert ingredient and the total percentage of inert ingredients adjusted accordingly.
- Add the statement "Contains petroleum distillate" as a footnote to the ingredient statement.
- 4. The declaration of Sumithrin in the ingredients statement should be as follows:

3-phenoxybenzyl-(1RS, 3RS; 1RS, 3SR)-2, 2-dimethyl-3-(2-methylprop-1-enyl) cyclupropanecarboxylate . . . . . . . . . . 6.406%

Note that all the isomers of this ingredient are now combined in the percentage.

57705:I:Tavano:L10~3:KEVRIC:U3/11/91:04/06/91:CL:WO:DD:CL

CONCURRENCES

SYMBOL | H2505C

SURNAME | Ta--DATE | 3/15/9;

EPA Ferm 1320-1 (12-70)

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- 5. Submit a revised Confidential Statement of Formula (CSF). Include the flashpoint for the product. Be sure to show the certified upper and lower limits for each active ingredient in pure active form.
- 6. The description of the manufacturing process is acceptable. However you must submit the complete product chemistry data for this new formulation.

Sincerely yours,

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

# SPEER

### **AUTOMATIC INDOOR FOGGER**

For Use in Rooms, Apartments, Homes, Attics, Basements, Campers, Boats, Household Storage Areas, Garages, Pet Sleeping Areas, Cabins

One Unit Treats Up to 5,000 Cubic Feet

#### **ACTIVE INGREDIENTS:**

Tetramethrin [(1-Cyclohexene-1,2-	
dicarboximido) methyl 2, 2-dimethyl-	
3-(2-methylpropenyl)	
cyclopropanecarboxylate	. 0.200%
"3-Phenoxybenzyl d-cis and trans" 12	
2-dimethyl-3-(2- methyl- propenyl)	
Cyclopropanecarboxylate]	0.383%
*Other isomers	0017%
Petroleum distillate	. 14.332%
ERT INGREDIENTS:	85.068%
	100,000%

<sup>\*6-</sup>icis, 1ians) phenothrin

IN

KEEP OUT OF REACH OF CHILDREN CAUTION See Back Panel for Additional Precautionary Statements

Kills Housellies, Mosquitos, Spiders, Fleas, Ticks, Centipedes, Wasps, Black Carpet Beetles, Sawtoothed Grain Beetles, Rice Weevils, Small Flying Moths, Pill Bugs, Crickets, Silverfish, and Cockroaches.

## **NET WEIGHT 7.5 OUNCES**

Manufactured by SPEER PRODUCTS INC Memon's TN 38118

EPA Reg. No. 11715.71 EP4 ES1 NO 11715 TN 1

#### STATEMENT OF PRACTICAL TREATMENT

If swallowed- Call a physician or Poison Control Control Control

irritation persists.

	Invage is indicated if material was zaken istarnally of INDUCE VOHITING. Vomiting may cause manimation affects of the control
If inhaled-	Remove victim to fresh air. Apply antibiotal respirated indicated.
if on skin-	Remove contaminated clothing and wash affected areas wi soap and water.
l( in eyes-	Flund eyes with plenty of water. Get medical attention

### PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Harmful if swallowed, Avoid inhalation of vapors. Avoid contact with ( eyes, or clothing. Wash contaminated skin promptly with soap and warm a For eyes, (lush with plenty of water. Cet medical attention if irritati sists. Avoid contamination of food and feedstuffs. Do not use in com food processing, preparation, serving, or storage areas. In the home, food processing surfaces and utensils should be covered during trees. thoroughly unshed before use. Cover exposed food. Remove pets, cover fish aquariums before spraying.

PHYSICAL OR CHEMICAL HAZARDS

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

Do not puncture or incinerate container. Exposure to temperatures about 130° F. may cause bursting.

#### DIRECTIONS FOR USE

GENERAL CLASSIFICATION

It is a violation of Federal law to use this product in a manner into tent with its labeling.

#### STORAGE AND DISPOSAL

STORAGE: Store in a cool, dry area away from heat or open flame. DISPOSAL: Replace cap and discard containers in trash. Do not punctur

This product will kill Houseflies, Mosquitoes, Fless, Ticks, Black Ca Saw-toothed Grain Section, Rice Weevils, Small Flying Moths, Spiders, Wosps, Pill Bugs, Crickets, Silverfish and Cockrosches.

To control fleas and ticks, destroy old bedding and replace. Repeat ( Treat dogs and eats with a registered tick control product prior to t One can treast one unobstructed area up to 6,000 cubic feet (20'x 30' tise additional units for remote rooms or where free flow of mist in a PREPARATION: Cover exposed food, dishes, and food handling equipment. and doors to area to be treated. Shot off fans and air conditioners. finmes except plint light. Position fogger not less than h It. from [ Close doors and windows. Point valve opening away from face and eyes Do not remain in the area during treatment and ventilate thoroughly ?

TO START FOGGING: Place Fogger on table, chair, or stand, at least size from pilot light. Place several thicknesses of newspapers under canic to prevent marring of surface. Hold can at arm's length, with top of pointing away from face and eyes. Push down on finger pad until it is This will start fogging action. Set caniater in upright position on etc. and leave treated area at once. DO NOT RE-ENTER TREATED AREA FO HOURS, then open exterior dore and windows and allow to air for 30 before reoccupying area.

<sup>\*\*</sup>Cis/Irans :somer ratio: max, 25% (+ or +) cis min 75% (+ or -) trans