Mr. David Williams Legal/Regulatory Affairs Director Speer Products, Inc. 4242 B.P. Goodrich Boulevard Memphis, TN 38118

Dear Mr. Williams:

Subject: Removal of Aromatic Petroleum Hydrocarbons and Petroleum Distillates from the Active Ingredient Section of the Label EPA Registration No. 11715-83

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, is acceptable subject to the following comments:

Carrier which

1. Replace the Statement of Practical Treatment with the following:

STATEMENT OF PRACTICAL TREATMENT

If Swallowed: Do not induce vomiting. Call a physician or Poison Control

Center immediately.

Lemove to fresh air. If Inhaled:

If On Skin: Remove contaminated clothing

> and wash affected areas with soap and water. Get medical attention if irritation

persists.

Flush eyes with plenty of If In Eyes:

water. Get medical attention

if irritation persists.

Note To Physician: Contains petroleum

distillate. Vomiting may

cause aspiration

pneumonia.

51280:I:WP5.0:Mendelsohn:C.Disk:KENCO:10/22/90:DD:EK:DD

| CONCURRENCES | | | | | | | | |
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| SYMBOL | | | | | | | | |
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2. Revise the Active Ingredients section to read:

Resmethrin 0.284%

- 3. Add the footnote "Contains petroleum distillates" below the ingredient's statement.
- 4. Submit an updated Confidential Statement of Formula.

A stamped copy of the label is enclosed for your records. Submit final printed labeling.

Sincerely yours,

Phil Hutton

Product Manager (17)

Insecticide-Rodenticide Branch Registration Division (H7505C)

Enclosure

Precautionary Statements HAZARDS TO HUMANS

CAUTION

Harmful If swallowed, Inhaled, or absorbed through the skin. Avoid breathing vapors. Avoid contact with the eyes, skin or clothing. In case of contact, immediately wash with soap and water. Avoid contamination of food and feedstuff.

Avoid excessive wetting of plastic vinyl asphalt tile floor surfaces or asphalt shingles. Do not apply to rugs, carpets, draperies, wallpaper, or similar materials that may be stained.

PHYSICAL HAZARDS

EXTREMELY FLAMMABLE, contents under pressure. Do not use near fire, heated surfaces, sparks or flame. Do not puncture or inclnerate container. Exposure to temperatures above 130°F may cause bursting.

SPEER WASP & HORNET KILLER

ACTIVE INGREDIENTS:

Related Compounds

"(Resmethrin [5-(phenylmethyl) 3 furanyl) methyl 2. 2-dimethyl-3-(2-methyl-1-propenyl) cyclopropanecarboxylate

0 250% 0 034%

INERTINGREDIENTS

99.7167

*Cis/Irans isomers ratio | max 30% (±) cis | mn 70% (±) trans | U.S. Fatent No. 3,465,007

Kills Wasps, Hornets, Yellow Jackets, Bees and Spiders

KEEP OUT OF REACH OF CHILDREN CAUTION

See Back Panel for Additional Precautionary Statements

NET WT. OZ. Avdp.

STATEMENT OF PRACTICAL TREATMENT

Skin - Wash with soap and water.

Eyes - Wash repeatedly with cold water.

Inhalation - Remove to fresh air.

Ingestion - Do not induce vomiting;

Consult physician

DIRECTIONS

It is a violation of Fede product in a manner in labeling.

STORAGE AND

Storage: Store in a cool : or open flame.

Disposal: Do not reus Wrap container and put

OUTDOORS: Application in the evening where Point spout toward new where insects are known container at arms length into hiding places, consects as possible. Re Always spray in direct wind at your back).

INDOORS: Aim directl spray areas where foo exposed or handled, treated areas. Ventila treatment is completed

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