

11/11 102 11-15 190

MAR 20 1990

310/252/2/7/1

Mr. David Williams  
Speer Products, Inc.  
4242 B.F. Goodrich Blvd.  
P.O. Box 18993  
Memphis, TN 38118

Dear Mr. Williams:

Subject: Revised Labeling and Confidential Statement of Formula (delete Methylene Chloride)  
Speer E-Z Way Total Release Fogger  
EPA Registration No. 11715-102  
Your Letters Dated July 19, September 1, and November 23, 1988

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable provided that you make the labeling changes indicated below prior to release for shipment of product bearing the amended labeling.

1. Delete "Petroleum Distillate" from the active ingredient portion of this label and include it in the total percentage of inert ingredients since this component of the formulation is a solvent.
2. The words "ACTIVE INGREDIENT(S)" and "INERT INGREDIENTS(S)" must be aligned to the same margin.
3. Add four asterisks to INERT INGREDIENTS and a footnote "\*\*\*\* Contains Petroleum Distillates."
4. Change "Destroy old pet bedding, etc." to Destroy pet's old bedding, etc."
5. Delete the cancer warning paragraph on the front panel and the protective clothing statement on back panel. These label statements required under the Reregistration Standard for Dichlorvos have been deferred until further notice. See our letter of September 30, 1988 (copy enclosed) regarding the matter.

Please provide the following product chemistry information:

1. The flashpoint of the product with the propellant.
2. The flashpoint/flash extension.

The flashpoint reported exceeds the one expected for this product

entirety to tests indicated in Section 156.10(h)(2)(iii) of Title 40 or the Code of Federal Regulations. (Flashpoints for pressurized liquids are conveniently measured after collecting the expelled liquid from the container in an open cup chilled with dry ice. See Aerosol Guide, CSMA.)

Submit five (5) copies of your final printed labeling before you release the product for shipment.

A stamped copy of the labeling is enclosed for your records.

Sincerely yours,

George T. LaRocca  
Product Manager (15)  
Insecticide-Rodenticide Branch  
Registration Division (E7507C)

E-Z WAY  
TOTAL RELEASE FOGGER

For use in Rooms, Apartments, Homes, Attics  
basements, Campers, Boats, Household Storage  
Areas, Garages, Kennels, Barns, Pet Sleeping  
Areas, Cabins, Warehouses, Schools, Theatres  
One Unit treats up to 6,000 cubic feet

ACTIVE INGREDIENTS:

D-trans Allethrin (allyl homolog of Cinerin I)	0.300%
Related Compounds	0.023%
*3 - Phenoxybenzyl d-cis and trans ** 2,2- dimethyl-3-(2-methylpropenyl) cyclopropanecarboxylate	0.191%
*Other isomers	0.009%
***2,2- Dichlorvos[2,2-dichlorovinyl dimethyl phosphate]	0.465%
*** Related Compounds	0.035%
Petroleum distillate	13.454%
INERT INGREDIENTS	85.523%
	100.000%

\* d(cis, trans) phenothrin

\*\* cis/trans isomer ratio: max. 25%(+ or-) cis  
min. 75%(+ or-) trans

\*\*\* From 5%(wt.) of dichlorvos, technical(DDVP)

The use of this product may be hazardous to your health. This product contains dichlorvos, which has been determined to cause cancer in laboratory animals. Dichlorvos also causes adverse liver effects in laboratory animals and is a potent cholinesterase inhibitor.

KEEP OUT OF REACH OF CHILDREN

CAUTION

See back panel for additional Precautionary  
Statements

KILLS

Fleas and Ticks

Houseflies, Mosquitoes, Cockroaches, Spiders, Centipedes,  
Wasps, Black Carpet Beetles, Saw-Toothed Grain Beetles,  
Rice Weevils, Small Flying Moths, Pill Bugs, Crickets,  
and Silverfish

Net Weight 7.5 Ounces

Speer Products, Inc.  
Memphis, TN 38118

EPA Reg. No. 11715-102

EPA Est. No. 11715-TN-1

MAR 20 1990

For more information, write,  
Speer Products, Inc.,  
P.O. Box 100, Memphis, TN 38118  
EPA Reg. No. 11715-102

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS  
AND DOMESTIC ANIMALS

CAUTION

Harmful if swallowed. Avoid inhalation of vapors. Avoid contact with skin, eyes or clothing. Wash contaminated skin promptly with soap and warm water. For eyes, flush with plenty of water. Get medical attention if irritation persists. Avoid contamination of food and feedstuffs.

Do not use in the edible products areas of food processing plants, restaurants, or other places where food is commercially prepared or stored. Do not use in serving areas while food is stored. In the home, all food processing surfaces and utensils should be covered during treatment or thoroughly washed before use. Cover exposed food. Wash hands thoroughly after using and before eating or smoking.

Remove pets, birds, and cover fish aquariums before spraying.

PHYSICAL OR CHEMICAL HAZARDS

Flammable. Contents under pressure. Keep away from heat, sparks, and flame. Do not puncture or incinerate container. Exposure to temperatures above 130° F. may cause bursting.

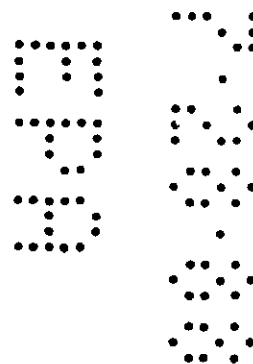
STATEMENT OF PRACTICAL TREATMENT

If **swallowed**- Call a physician or Poison Control Center immediately. Gastric lavage is indicated if material was taken internally. DO NOT INDUCE VOMITING. Vomiting may cause aspiration pneumonia.

If **inhaled**- Remove victim to fresh air. Apply artificial respiration if indicated.

If **on skin**- Remove contaminated clothing and wash affected areas with soap and water.

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



## DIRECTIONS FOR USE

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

Wear chemical resistant gloves, long-sleeved shirt, long-legged pants, shoes and socks when handling the product. Do not allow children or pets to enter treated rooms until thoroughly ventilated or to contact treated surfaces until sprays have dried.

## 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 puncture or incinerate.

## FOR USE ONLY WHEN AREA HAS BEEN VACATED BY HUMAN BEINGS AND PETS

Use one canister for each 6,000 cubic feet of unobstructed area. Example: 30' long x 20' wide x 10' high = 6,000 cu. ft. Use additional units for remote rooms or where the free flow of the mist is not assured.

**PREPARATION:** Open cabinets and doors to areas to be treated. Shut off fans and air conditioners. Put out all open flames except pilot light. Remove pets and cover fish tanks or fish bowls with paper, or remove from area. Cover asphalt tile, waxed wood floors, waxed furniture and articles made of cotton terrycloth which are in the vicinity of the Fogger (newspapers may be used). Close exterior doors and windows. Cover exposed foods, dishes, and food handling equipment.

**TO START FOGGING:** Place Fogger on table, chair or stand, at least six feet from pilot light. Place several thicknesses of newspapers under canister to prevent marring of surface. Hold can at arm's length, with top of can pointing away from face and eyes. Push down on finger pad until it locks- this will start fogging action. Set canister in upright position on table, etc. and leave building at once.

**DO NOT RE-ENTER BUILDING FOR TWO HOURS,** then open exterior doors and windows, turn on fans or other mechanical ventilation systems and allow to air for two hours before reoccupying area. If additional units are used for remote rooms or where free flow of mist is not assured, increase airing out time accordingly.

**TO KILL FLEAS AND TICKS:** Destroy old pet bedding and replace. Use product as above. Treat dogs and cats with a registered Flea and Tick control product prior to re-entry.