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JUL 26 1988

BEST AVAILABLE COPY

Mr. David Williams, J.D.
Regulatory Affairs Specialist
Speer Products, Inc.
P.O. Box 18993
Memphis TN 38118

Dear Mr. Williams:

Subject: Formulation Amendment Reflected on Your
Confidential Statement of Formula Dated
October 17, 1988 and Updated Labeling
EPA Registration No. 11715-108

The formulation and labeling amendments referred to above, submitted in connection with registration under section 3(c)(7)(A) of the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, are acceptable subject to the following comments.

1. The formulation described on your October 17, 1988 Confidential Statement of Formula (CSF) is the basic and only formula used to formulate your product.
2. Remove the phrase "General Classification" from the label.
3. Due to the hydrocarbon propellents present in your formulation, add the statement "Extremely Flammable" to the beginning of the Physical or Chemical Hazards statements.
4. We have no verification from the U.S. Department of Agriculture (USDA) that your product can be used in "Food processing plants."

Your labeling makes reference to areas that may be considered as USDA meat and poultry processing plants. You must either:

- a. File a separate application with USDA to obtain approval in such processing plants, in which case the label wording should be changed to reflect USDA acceptance, or

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CONCURRENCES

SYMBOL							
SURNAME							
DATE							

- b. Qualify your site designation to exclude USDA meat and poultry processing plants.

You may submit your application to:

Mr. Charles Edwards
Compound Evaluation Laboratory
Scientific Services, FSQS
Food Ingredient Assessment Division
U.S. Department of Agriculture
Building 206, BARC - East
Beltsville, MD 20705
(301) 344-2566

Submit a copy of the approved application to EPA for your file.

Sincerely yours,



Phil Wutton
Product Manager (17)
Insecticide-Rodenticide Branch
Registration Division (H7505C)

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ACCEPTED
WITH COMMENTS
EPA Label Dated:

JUL 26 1990

Under the Federal Insecticide,
Fungicide and Rodenticide Act as
amended, for the pesticide
registered under EPA Reg. No.

11715-1.08

CONTAINER LABEL

MAGIC GUARD AUTOMATIC FOGGER NO. II (DOUBLE STRENGTH FORMULA)

One Unit Treats Up to 5,000 Cubic Feet

ACTIVE INGREDIENTS:

Pyrethrins	1.00%
Piperonyl Butoxide Technical	2.00%
(N-octyl bicycloheptane dicarboximide	3.34%
Petroleum Distillate	10.00%
INERT INGREDIENTS:	83.66%

Equivalent to 1.60% (butylcarbityl) (5-propylpiperonyl) ether and
0.40% other related compounds,
MGK 264, Insecticide Synergist

KEEP OUT OF REACH OF CHILDREN

CAUTION: See side panel for additional precautions.

NET WT. 3 OZ.

EPA REG. NO. 11715-108

EPA EST. NO. 11715-TN-1

Manufactured by:
SPEER PRODUCTS, INC.
Memphis, TN 38118

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STATEMENT OF FIRST AID

IF INHALED- Remove victim to fresh air. If breathing is difficult, call a physician immediately. Do not use mouth-to-mouth respiration.

IF ON SKIN- Remove contaminated clothing. Wash skin with plenty of water. Get medical attention if irritation persists. Avoid contamination of food and feedstuffs.

IF IN EYES- Flush eyes with plenty of water. Get medical attention if irritation persists.

IF SWALLOWED- Call a physician immediately. Do not induce vomiting. Get medical supervision.

Directions for Use
GENERAL CLASSIFICATION
It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

STORAGE AND DISPOSAL
Storage: Store in a cool, dry place.
Disposal: Replace cap and discard container or puncture.

Carefully read DIRECTIONS

Directions for Use
General Classification
It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

STORAGE AND DISPOSAL
Storage: Store in a cool, dry place.
Disposal: Replace cap and discard container or puncture.

all ticks, destroy old pet bedding and replace. Treat dogs and cats with a registered flea control product prior to re-entry.

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

1. and compare for each 5,000 cu. ft. of unobstructed area. 25" long x 20" wide x 10" high is 5,000 cu. ft. 2 additional units for remote rooms or where one unit may be not assured.

PREPARATION Open cabinets and doors to areas to be treated. Shut off fans and air conditioners. Put out all open fires except pilot light. Remove pets and cover fish tanks or 1 bowls with paper or remove from area. Close exterior doors and windows. Cover exposed foods, dishes, and food holding equipment. Remove and dispose of insect infested and old food products prior to fogging.

START FOGGING Place fogger on table, chair or stand, at least 6 feet from pilot light. Place several thick mats of newspapers under fogger to prevent marking of surface. Fog for 10 minutes. Then top of can pointing away from eyes. Push down on trigger and hold it down until all fogging action. Set fogger 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 and allow to air for 30 minutes before reoccupying.

FOOT OR NECESSARY

KILLS:
FLIES
MOSQUITOES
WASPS & HORNETS
SMALL FLYING MOTHS
FRUIT FLIES
GNATS

KILLS EXPOSED:
COCKROACHES
FLEAS
TICKS
CRICKETS
SILVERFISH
(NYMPHS & ADULTS)

Mfg By:
SPEER PRODUCTS, INC.
MEMPHIS, TN 38118

MAGIC GUARD AUTOMATIC FOGGER NO. II (DOUBLE STRENGTH FORMULA)

For Homes, Apartments, Restaurants, Hotel Kitchens, Dairies, Food Processing Plants, Warehouses, Box Cars, Trucks, Barns, Kennels, and Buildings Up To 5,000 Cubic Feet.

ACTIVE INGREDIENTS:

Pyrethrins	1.00%
Piperonyl Butoxide Technical	2.00%
(N-octyl bicycloheptane dicarboximide	3.34%
Petroleum Distillate	10.00%
INERT INGREDIENTS:	83.66%

Equivalent to 1.60% (butylcarbityl) (5-propylpiperonyl) ether and 0.40% other related compounds,
MGK 264, Insecticide Synergist

CAUTION

KEEP OUT OF REACH OF CHILDREN

See Side Panel for Additional Precautionary Statements

EPA REG. NO. 11715-108

EPA EST. NO. 11715-TN-1

NET WT. 3 oz.

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 apply directly to food. In food plants do not use while food processing is underway. All food processing surfaces and utensils should be covered during treatment or thoroughly washed before use. Cover exposed food.

Remove pets, birds and cover fish aquariums before spraying.

Physical Hazards

Contents under pressure. Do not use or store near heat or open flame. Do not puncture or incinerate container. Exposure to temperature above 130°F may cause bursting.