

JUN 20 1992

Ms. Joyce B. Pazianos
Pazianos Associates
1338 G Street, SE
Washington, D.C. 20003

Dear Ms. Pazianos:

Subject: Chlorpyrifos Data Call-In, Revised Confidential
Statement of Formula and Product Labeling
SPI Carpet Spray (with Dursban)
EPA Registration No. 11715-139
Submissions Dated October 15, 1991 and
April 14, 1992

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable. A stamped copy is enclosed for your records.

At the next printing of the label, please delete the phrase "...for at least 15 minutes with water" from the Statement of Practical Treatment for "If In Eyes." Replace it with the phrase "...with plenty of water."

We also acknowledge receipt of the current Confidential Statement of Formula (CSF) for this product, submitted with your letter dated June 18, 1992. In the cover letter you requested that this CSF replace those included in the October 15, 1991 and April 14, 1992 submissions since they contained discrepancies. We have reviewed the CSF and have concluded that it is acceptable, however, the upper and lower certified limits for chlorpyrifos have been incorrectly calculated. Based on the label claim of 0.5%, which also represents the nominal value, N, these limits should be calculated as plus (+) or minus (-) 10%(N), ie. 0.55 for the upper limit, and 0.45 for the lower limit. This is based on the Table of standard certified limits in section 158.175 of Title 40 of the Code of Federal Regulations. We have noted these corrected limits on our copy of the CSF, therefore, you need not submit a new CSF at this time.

2.4 =

The submission dated October 15, 1991 responding to the Chlorpyrifos Data Call-In documented the source of your active ingredient as a registered technical product. This satisfies the requirements for the Generic Data Exemption claim.

If you have any questions concerning this letter, please contact me at (703)-305-6386.

Sincerely,

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Dennis H. Edwards, Jr.
Product Manager 19
Insecticide-Rodenticide Branch
Registration Division (H7505C)

Enclosure

PH19 11715-139

**Precautionary Statements
HAZARDS TO HUMANS AND
DOMESTIC ANIMALS
CAUTION**

May be harmful if swallowed, inhaled or absorbed through skin. Avoid breathing spray mist and provide adequate ventilation of area being treated. Avoid contact with skin, eyes and clothing. In case of contact immediately flush skin and eyes with plenty of water. Wash thoroughly with soap and water after handling. If poisoning occurs, get prompt medical aid. Do not allow children or pets to contact treated surfaces until dry.

**STATEMENT OF PRACTICAL
TREATMENT**

If swallowed-Drink one or two glasses of water and induce vomiting by touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person. Get medical attention immediately.

If Inhaled - Remove victim to fresh air and apply respiration if indicated.

If on skin - Wash promptly with soap and water. Rinse thoroughly.

If in eyes - Rinse eyes for at least 15 minutes with water and call a physician immediately.

NOTE TO PHYSICIAN: Chlorpyrifos is a cholinesterase inhibitor. Treat symptomatically. Atropine, by injection, is antidote of choice.

Do not use in commercial food processing or preparation areas. In the home, 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. Do not allow children or pets to contact treated surface until spray has dried.

PHYSICAL OR CHEMICAL HAZARDS

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

**SPI CARPET
SPRAY**

(WITH DURSBAN®)

**KILLS FLEAS, BROWN DOG TICKS,
MITES, LICE AND OTHER LISTED
INSECTS**

ACTIVE INGREDIENTS:

Pyrethrins.....	0.025%
Piperonyl butoxide, technical*.....	0.050%
N-Octyl bicycloheptene dicarboximide**...	0.084%
Chlorpyrifos [0,0-diethyl 0-(3,5,6-trichloro-2-pyridyl) Phosphorothioate].....	0.500%
INERT INGREDIENTS†.....	99.341%
	100.000%

†Contains petroleum distillates

*Equivalent to 0.04% (butylcarbityl)(6-propyl-piperonyl) ether and 0.01% related compounds.

**MGK 264 Synergist

DURSBAN® Trademark of THE DOW CHEMICAL COMPANY

**KEEP OUT OF REACH OF
CHILDREN
CAUTION**

**See Additional Precautions on Left
Panel.**

Net Wt. oz.

**Manufactured By:
SPEER PRODUCTS, INC.
Memphis, TN 38118**

EPA Reg. No. 11715-139 EPA Est. No. 11715-TN-1

DIRECTIONS FOR USE

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

STORAGE AND

Do not contaminate water and disposal.

Storage: Store in a cool, open flame.

Disposal: Replace trash. Do not incinerate

SHAKE WELL BEFORE USE

This water-based insecticide has a kerosene odor, is non-staining on carpets, rugs, floors, or draperies, should be taken not to damage furniture or carpeting which has been treated with dark linings. Do not use if fabric is too wet.

FLEAS & BROWN DOG TICKS

Move furniture away from carpeting at least 24 inches from carpeting.

When using this product, spray at the rate of one quart per square surface is wet. Thoroughly spray along and behind baseboards.

Allow carpet to dry before replacing furniture. After replacing furniture, spray as above.

Leave treated areas and dog houses for 24 hours. Do not allow children or pets on treated surfaces until they are completely dry.

Do not spray pets with this product. Use with a registered flea and tick repellent.

Do not use as a source of your infestation.

FLEAS & BROWN DOG TICKS AND KENNELS: Remove furniture from interior of dog house and spray outside runways.

ROACHES, WATERBUGS, and CRICKETS: Thoroughly spray baseboards and around other places where insects hide.

SILVERFISH AND FIREBRICK: Thoroughly spray baseboards, behind shelves, and in storage areas.

SCORPIONS AND SPIDERS: Thoroughly spray pests when possible. Treat areas and garages where pests hide.

Spray points of entry such as cracks and crevices.