

JUN 10 1993

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Mr. Jim Wallace
 Speer Products Inc.
 4242 B.F. Goodrich Blvd.
 P.O. Box 18993
 Memphis, TN 38181-0993

Dear Mr. Wallace:

Subject: Amendment - Label Update
 SPEER-IT FOGGER I TOTAL RELEASE FOGGER
 EPA Registration No. 11715-178
 Your Submission dated March 31, 1993

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments listed below. Five copies of the finished labeling must be submitted prior to releasing the product for shipment.

1. Under Directions for Use

- a. Add feed following the word food i.e
Do not use in the food/feed areas of food/feed handling establishments.....where food/feed is commercially prepared
- b. Change "served" to "processed" in the sentence ending:
 "commercially prepared or served".
- c. In the third paragraph the sentence beginning with
Cover or remove exposed foodsetc. should be preceded with the phrase, "In the home".
 You may then delete the same sentence under Precautionary Statements.
- d. Use of an excessive number of total release cans has led to incidents (explosions) under certain circumstances. The flammability issue of aerosol cans is currently being considered under the Flammability FR Notice. In the interim the following statements should be added to the use directions of total release act labels.

"Do not use this unit in a cabinet or under a counter or table. Do not use this unit in an area less than 100 cubic feet".

CONCURRENCES

SYMBOL								
SURNAME	MOATS							
DATE	6/9/93							

2. Revise the USDA approval statement to read:
"Authorized for use in inedible (non-food) product areas of USDA
Meat and Poultry Plants".

Sincerely yours,

George T. LaRocca
Product Manager (13)
Insecticide-Rodenticide Branch
Registration Division (H7505C)

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND
DOMESTIC ANIMALS
CAUTION**

USE ONLY WHEN AREA TO BE TREATED IS VACATED BY HUMANS AND PETS. Harmful if swallowed or absorbed through skin. Avoid breathing vapors or spray mist. Avoid contact with skin and eyes. In case of contact, immediately flush eyes or skin with plenty of water. Obtain medical attention if irritation persists. Do not apply directly to food. In the home, all food processing surfaces and utensils should be covered during treatment or thoroughly washed before use. Remove pets and birds and cover fish aquariums before spraying. Remove all motor vehicles before using in garages. Use in food processing facilities should be confined to time periods when the plant is not in operation.

PHYSICAL OR CHEMICAL HAZARDS
Contents under pressure. Do not puncture. Do not use or store near heat or open flame. Exposure to temperatures above 130° F may cause bursting. Never throw container into fire or incinerator. Newspapers should be spread on the floor for several feet around area of release.

**STATEMENT OF PRACTICAL
TREATMENT**

If swallowed- Call physician or Poison Control Center immediately.
If inhaled- Remove victim to fresh air. Apply artificial respiration if indicated.
If on skin- Remove contaminated clothing and wash affected area with soap and water.
If in eyes- Flush eyes with plenty of water. Obtain medical attention if irritation persists.

STORAGE AND DISPOSAL

Storage: Store in a cool, dry area away from heat or open flame.
Disposal: Do not re-use empty container. Wrap container and put in trash collection. Do not puncture or incinerate.

Manufactured by
SPEER PRODUCTS, INC.
MEMPHIS, TN 38118

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 11715-178

**SPEER-IT
FOGGER 1
TOTAL RELEASE
FOGGER**

Exclusive Water-based formula
**KILLS FLEAS (ADULT & PRE-ADULT),
ROACHES, ANTS, TICKS, SPIDERS, FLYING
MOTHS, FLIES, MOSQUITOS, SILVERFISH,
PALMETTO BUGS, WASPS, HORNETS,
CRICKETS.**

Kills the ticks that may carry Lyme Disease.

ONE UNIT TREATS UP TO 6,000 CUBIC FEET

For use in apartments, attics, basements, boats, cabins, campers, garages, homes, household storage areas, kennels, pet sleeping areas, rooms, washrooms, and the non food/feed areas of restaurants, hospitals, hotels, industrial buildings, offices, motels, preschools, schools, seed houses, box cars, closed barns, horse stables, theaters, trucks, and warehouses.

ACTIVE INGREDIENTS:	
Cyano (3-phenoxyphenyl)methyl 4-chloro-alpha-(1-methylethyl) benzeneacetate.....	0.400%
N-Octyl bicycloheptene dicarboximide*.....	0.166%
Piperonyl butoxide, technical**.....	0.100%
Pyrethrins	0.050%
INERT INGREDIENTS.....	99.284%

*MGK Synergist 264
**Equivalent to 0.080% of (butylcarbityl)(6-propyl-piperonyl)ether and 0.020% related compounds

**KEEP OUT OF REACH OF
CHILDREN
CAUTION**

Net Weight 6 oz. (170 grams)

DIRECTIONS

It is a violation of Federal law to use this product in a manner inconsistent with the label. Do not use in food areas, restaurants, commercial food service areas, or areas where food is prepared or served such as dining rooms, food handling surfaces and cooking utensils, or where food is stored. Non-food/feed areas of food processing facilities such as garbage rooms, lavatories, restrooms, boiler rooms, garages, etc. (after canning or bottling). This product will kill fleas, roaches, houseflies, black flies, spiders, flying moths, moths, grain beetles, rice beetles, flour beetles, wasps, hornets, etc. or remove exposed food from equipment. All food processing equipment should be cleaned after treatment. Open cabinets and doors. Shut off fans and air conditioning except pilot light. Fogger should be used in the middle of the room. Use one unit per 6,000 cubic feet of space. Do not use in container to prevent material for each 3,000 cubic feet of space. Use additional units for restricted areas. Use of mist is not assured. Do not use actuator tab to locked position when activating. Point to eyes. Set in upright position. Leave undisturbed for 24 hours. Open windows and allow to air out.

Approved for use in USDA

Contains no CFCs or other ozone depleting substances. Federal regulation required for aerosols.

See additional Precautionary Statements on side panel with COMMENTS in EPA Letter Dated

JUN 10 1993

EPA Reg. No. 11715-178 EPA Est.No. 11715-TN-1