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JUL 28 1994

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

Dear Mr. Wallace:

Subject: Amendment - Label  
Speer-It-Fogger I Total Release Fogger  
EPA Registration No. 11715-178  
Your Submission dated June 1, 1994

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. In our letter we indicated not to use unit in an area less than 100 cubic feet. Since the minimum container rate is 3000 cubic feet, change the statement to read :  
....."Do not use this unit in an area less than 3000 cubic feet"

The Agency recently issued a proposed rule, proposing additional restrictions on total release foggers. Refer to the Federal Register Notice of April 15, 1994 (59 FR 18058).

A stamped copy is enclosed for your records.

Sincerely yours,

George T. LaRocca  
Product Manager (13)  
Insecticide-Rodenticide Branch  
Registration Division (7505C)

Enclosure:

**BEST AVAILABLE COPY**

CONCURRENCES

SYMBOL							
SURNAME	Mouts						
DATE							

**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. 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.

Authorized by USDA for use in inedible (non-food) areas of federally inspected meat and poultry plants.

Contains no CFCs or other ozone depleting substances. Federal regulations prohibit CFC propellants in aerosols.

Manufactured by  
**SPEER PRODUCTS, INC.**  
MEMPHIS, TN 38118

**SPEER-IT FOGGER I  
TOTAL RELEASE  
FOGGER**

*Exclusive Water-based formula*

**KILLS FLEAS (ADULT & PRE-ADULT), ROACHES, ANTS, TICKS, SPIDERS, FLYING MOTHS, FLIES, MOSQUITOS, SILVERFISH, PALMETTO BUGS, WASPS, HORNET 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%
<b>INERT INGREDIENTS.....</b>	<b>99.284%</b>

\*MGK Synergist 264

\*\*Equivalent to 0.080% of (butylcarbityl) (6-propylpiperonyl) ether and 0.020% related compounds

**KEEP OUT OF REACH OF CHILDREN  
CAUTION**

See additional Precautionary Statements on side panel.

**Net Weight 6 oz. (170 grams)**

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

**DIRECTIONS**

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Do not use in food/feed areas of restaurants, hotels, commercial establishments, restaurants, or other areas where food is exposed or prepared. Do not use in areas where food is prepared or stored, such as garbage rooms, lavatories, restrooms, offices, locker rooms, garages, mop closets, etc. (bottling).

This product will kill fleas, houseflies, black carpet beetles, moths, mosquitos, silverfish beetles, pill bugs, crickets, hornets and palmetto bugs. exposed foods, dishes and food processing surfaces should be treated or thoroughly cleaned. windows. Open cabinets and Shut off fans and air conditioning pilot light. **Do not use this fogger on counter or table. Do not use in 100 cubic feet.** Fogger should be used in the room. Place newspaper on marring surfaces. Use one can per 100 cubic feet of unobstructed space (30'x20'x10' room). Use additional foggers where free flow of mist is not possible. Down actuator tab to locked position. activating. Point top of can in upright position and leave undisturbed for 2 hours. Operate fan for 1 hour.