



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

AUG 16 2003

William L. Washburn
Speer Products Inc.
4242 B.F. Goodrich Blvd.
Memphis, TN 38118


Subject: Amendment - Updating First Aid Statement per PR Notice 2001-1, Disposal
Instructions per PR Notice 2001-6
Speer-It Fogger 1 Total Release Fogger
EPA Reg. No. 11715-178
Your Submission Dated April 1, 2003

Dear Mr. Washburn:

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. Two (2) copies of the finished labeling must be submitted prior to releasing the product for shipment. A stamped copy of the label is enclosed for your records.

1. Replace "Inert Ingredients" with the phrase "Other Ingredients" under the ingredients statement.
2. Make the following changes to the Precautionary Statements:
 - a. Replace "Harmful if swallowed or absorbed through skin." with "Harmful if absorbed through skin."
 - b. Add "clothing" to the end of the sentence "Avoid contact with skin and eyes".
 - c. Add "Wash thoroughly with soap and water after handling".
 - d. Delete "In case of contact immediately flush eyes or skin with plenty of water".
3. Move the statement "Use only when area to be treated is vacated by humans and pets" and the statements beginning "Do not apply directly to food xxx etc and ending " xxx when the plant is not in operation.", to the directions for use section of the label.

Note, base on the acute toxicity of your product (Toxicity Category IV), you are not required to have If eye, If swallowed or If inhaled first aid statement. You may carry the statements if you wish. If you have any questions regarding this action, please contact BeWanda Alexander of my team at (703) 305-7460.

Sincerely,

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

SPEER-IT FOGGER I TOTAL RELEASE FOGGER

Water-based formula

KILLS FLEAS (ADULT & PRE-ADULT), ROACHES, ANTS, TICKS, SPIDERS, FLYING MOTHS, FLIES, MOSQUITOES, SILVERFISH, PALMETTO BUGS, WASPS, HORNETS and 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) benzeneacetat.....	0.400%
N-Octyl bicycloheptene dicarboximide*	0.166%
Piperonyl butoxide, technical**	0.100%
Pyrethrins	0.050%
INERT INGREDIENTS	99.284%
	100.000%

*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

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.

FIRST AID	
IF SWALLOWED:	<ul style="list-style-type: none"> Call poison control center or doctor immediately for treatment advice. Have person sop a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person.
IF ON SKIN OR CLOTHING:	<ul style="list-style-type: none"> Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.
IF IN EYES:	<ul style="list-style-type: none"> Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

IF INHALED:

- Move person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.
- Call a poison control center or doctor for further treatment advice.

HOT LINE NUMBER

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-877-757-4943 for emergency medical treatment information.

PHYSICAL OR CHEMICAL HAZARDS

This product contains a highly flammable ingredient. It may cause a fire or explosion if not used properly. Follow the "Directions for Use" on this label very carefully



**Highly Flammable Ingredient
Ingrediente Altamente Inflamable**

Extremely flammable. Contents under pressure. Keep away from fire, sparks and heated surfaces. Do not puncture or incinerate container. 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.

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.

DIRECTIONS FOR USE

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

DO NOT use more than one fogger per room. DO NOT use in small, enclosed spaces such as closets, cabinets or under counters or tables. Do not use in a room 5 ft. x 5 ft. or smaller; instead, allow fog to enter from other rooms. **Turn off ALL ignition sources such as pilot lights (shut off gas valves), other open flames or running electrical appliances that cycle off and on (i.e., refrigerators, thermostats, etc.).** Call your gas utility or management company if you need assistance with your pilot lights.

Do not use in food/feed areas of food/feed handling establishments, restaurants, or other areas where food/feed is commercially prepared or processed. Do not use in serving areas while food is exposed or facility is in operation. Serving areas are areas where prepared foods are served such as dining rooms but excluding areas where foods may be prepared or held. In the home, cover all food handling surfaces and cover or remove all food and cooking utensils, or wash thoroughly after treatment. Non-food/feed areas are areas such as garbage rooms, lavatories, floor drains (to sewers), entries and vestibules, offices, locker rooms, machine rooms, boiler rooms, garages, mop closets and storage (after canning or bottling).

This product will kill fleas (adults and pre-adult), roaches, houseflies, black carpet beetles, ticks, ants, spiders, flying moths, mosquitoes, silverfish, saw-toothed grain beetles, rice beetles, pill bugs, crickets, confused flour beetles, wasps, hornets and palmetto bugs. In the home, cover or remove exposed foods, dishes and food handling equipment. All food processing surfaces should be covered immediately prior to treatment or thoroughly cleaned after treatment. Close doors and windows. Open cabinets and doors within the treatment area. Shut off fans and air conditioners. Fogger should be placed on floor in the middle of the room. Place newspapers under the container to prevent marring surfaces. Use one container for each 6,000 cubic feet (approximately 30'x20'x10'room). To start fogging, press down actuator tab to locked position. Keep at arm's length when activating. Point top of can away from face and eyes. Set in upright position and leave the building at once. Leave undisturbed for 2 hours. Open doors and windows and allow to air for 1 hour.

STORAGE AND DISPOSAL

STORAGE: Store in a cool, dry area away from heat or open flame.

DISPOSAL: Do Not Puncture or Incinerate!

If empty: Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency or 1-800-CLEANUP for disposal instructions.

**MANUFACTURED BY
SPEER PRODUCTS, INC.
4242 B. F. GOODRICH BLVD.
MEMPHIS, TN 38181-0993**

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**ACCEPTED
with COMMENTS
In EPA Letter Dated**

AUG 16 2003

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

11715-178