

MAR -4 1998

Mr. Bill Washburn  
Speer Products, Inc.  
4242 B.F. Goodrich Blvd.  
Memphis, TN 38118

Dear Mr. Washburn:

Subject: Label Amendment- increase residual activity and speed of  
kill  
Speer Roach Spray I  
EPA Registration Number 11715-184  
Your submission dated January 6, 1998

This amendment referred to above, submitted in connection with  
registration under FIFRA section 3(c)(7)(a), is acceptable,  
provided that you:

1. Submit and/or cite all data or other material required  
for registration/reregistration of your product under FIFRA section  
3(c)(5) or FIFRA section 4 when the Agency requires all registrants  
of similar products to submit such data.

2. Make the labeling changes listed below before you release  
the product for shipment bearing the amended labeling:

a. Delete "Kills instantly".

b. The efficacy data supports up to 6 months control of  
cockroaches. Those label bullets claiming residual control must be  
qualified to reflect roaches.

c. Delete all bullets referring to "revolutionary  
aerosol", "revolution in aerosols"; next generation", exterminates  
roaches". Words or phrases implying that a product possess unique  
characteristics; claims which imply total eradication and  
misleading comparisons with other pesticides are unacceptable.

d. "New" can only be used for six months from the date of  
this notice.

3. Submit two (2) copies of your final printed labeling before you release the product for shipment. Refer to the A-79 enclosure for a further description of final printed labeling.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

A stamped copy of the label is enclosed for your records.

Sincerely,

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

Enclosure

[Front Panel]

## SPEER ROACH SPRAY I

To control, cockroaches, waterbugs, palmetto bugs, scorpions, millipedes, centipedes, sowbugs, pillbugs, ants, silverfish, firebrats, spiders, crickets, clover mites, cheese mites, granary weevils, confused flour beetles, rust red flour beetles, drugstore beetles, meal worms, grain mites, cadellies, carpet beetles, bedbugs, fleas, ticks, clothes moths, house flies, fruit flies, gnats, mosquitoes, skipper flies, wasps, hornets, bees, black flies.

FOR USE IN HOUSEHOLDS, GARAGES, KENNELS  
AND THE NON-FOOD/FEED AREAS OF  
WAREHOUSES, SCHOOLS, OFFICE BUILDINGS,  
THEATERS, HOTELS, MOTELS

### [ALTERNATE MARKETING LANGUAGE IN BRACKETS][Choose from the following]

[A revolution in aerosols] or [A revolutionary aerosol]

[Next generation aerosol (spray) (dry spray)]

[Not only provides quick kill, but creates a barrier to help keep roaches out]

[Provides quick kill and creates a barrier to help keep roaches out]

[Kills quickly] [Creates a barrier (barricade) that helps (to help) keep roaches out]

[Kills roaches you can't see] or [Kills roaches behind walls]

[No unpleasant odor]

[No messy residue]

[Dry Formula]

[Dry Spray]

[NEW!]

[Creates a barrier to keep roaches out -or- away for (up to) 3 -or- 4 -or- 5 -or- 6 months]

[Kills for (up to) 3 -or- 4 -or- 5 -or- 6 months]

[Kills quickly -or- instantly]

[Kills roaches on contact]

### ACTIVE INGREDIENT:

\*Permethrin ..... 3.50%

INERT INGREDIENTS: ..... 96.50%

TOTAL ..... 100.00%

\*(3-phenoxyphenyl)methyl(+/-) cis/trans 3-(2,2-dichloroethenyl) 2,2-dimethyl cyclopropanecarboxylate. Cis/trans ratio: min. 35% (+/-) cis and max 65% (+/-) trans

KEEP OUT OF REACH OF CHILDREN

CAUTION

See Side Panel for Additional Precautionary Statements.

Net Weight:

[End Front Panel]

[Start Side Panel Language]

### PRECAUTIONARY STATEMENTS

#### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

**CAUTION:** Harmful if swallowed, inhaled, or absorbed through skin. Prolonged or frequently repeated contact may cause allergic reactions in some individuals. Avoid breathing vapor or spray mist. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse. Do not apply when classrooms are in use.

Do not use in food/feed areas of food/feed handling establishments, restaurants or other areas where food is commercially prepared or processed. Do not use in serving areas while food/feed is exposed or facility is in operation. Serving areas are areas where prepared foods/feed are served such as dining rooms but excluding areas where foods may be prepared or held. In the home all food processing surfaces and utensils should be covered during treatment or thoroughly washed before use. Non-food/non-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).

### STATEMENT OF PRACTICAL TREATMENT

**IF SWALLOWED:** Call a physician or poison control center. Drink one to two glasses of water and induce vomiting by touching the back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person.

**IF ON SKIN:** Wash with plenty of soap and water. Get medical attention.

**IF ON SKIN:** Wash with plenty of soap and water. Get medical attention.

**IF INHALED:** Remove victim to fresh air. If not breathing give artificial respiration, preferably mouth to mouth. Get medical attention.

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

11715-184

### PHYSICAL OR CHEMICAL HAZARDS

Contents under pressure. Do not use or store near heat or open flame. Do not use this product in or on electrical equipment due to shock hazard. Do not puncture or incinerate container. Exposure to temperatures above 130 degrees F may cause bursting.

### STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

**Storage:** Store in a cool, dry area away from heat or open flame. **Disposal:** This container may be recycled in the few but growing number of communities where steel aerosol can recycling is available. Before offering for recycling, empty the can by using the product according to the label. (DO NOT PUNCTURE!). If recycling is not available, wrap the container and discard in trash.

### DIRECTIONS FOR USE

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

### INSERT STRAW FIRMLY INTO THE ACTUATOR

**TO KILL COCKROACHES, ANTS, CRICKETS, WATERBUGS, PALMETTO BUGS, SCORPIONS AND PILLBUGS:** Spray on floors, along baseboards in the kitchen and baths. Special attention should be paid to areas around refrigerators and entry points such as doors, windows, vents, pipes, etc.

**TO KILL FLYING INSECTS (e.g. mosquito, flies, gnats, wasps, and bees):** Close space to be treated. Spray above head with a sweeping motion 3 feet from surfaces. Spray 10 grams (10 seconds) per 1,000 cubic feet of space. Keep treated area closed for at least 30 minutes after spraying. Do not remain in treated area and ventilate area before re-entry. Repeat as necessary.

**TO KILL SOWBUGS, CENTIPEDES, SILVERFISH, FIREBRATS AND SPIDERS:** Contact as many insects as possible with the spray. Also thoroughly spray all parts of the room suspected of harboring these pests. Special attention should be paid to cracks, crevices, hidden surfaces under sinks and behind refrigerators.

**TO KILL CARPET BEETLES:** Spray directly on beetles, floors, baseboards, shelves, and carpet. Allow carpet to dry thoroughly before use. Repeat treatment as necessary.

**TO KILL BEDBUGS:** Spray mattresses, particularly around tufts and seams. Take beds apart and spray into all joints. Treat baseboards, moldings, and floors. Allow all treated articles to dry thoroughly before use. Repeat treatment as necessary.

**TO CONTROL CLOTHES MOTHS:** Remove any infested articles from storage, brush thoroughly, and air for several hours in sunlight, if possible. Apply spray liberally to empty chests, closets, bureaus, and other storages, directing the spray into cracks, joints, and crevices. After airing, infested articles may be treated lightly, keeping nozzle at least three feet from fabric to avoid staining.

**TO KILL EXPOSED STAGES OF CONFUSED FLOUR BEETLES, RUST RED FLOUR BEETLES, GRANARY WEEVILS, GRAIN MITES, DRUGSTORE BEETLES, MEAL WORMS, CADELLES:** Spray into cracks and crevices, processing and handling equipment, around cartons or containers or other areas where these insects tend to congregate. Keep area closed for 45 minutes to 1 hour after treatment. Repeat application as necessary. Infested stored food products in the home should be disposed of.

**TO KILL FLEAS AND BROWN DOG TICKS:** Remove and destroy pet's old bedding. Spray sleeping quarters of pets, around baseboards, window and door frames, wall cracks and local areas of floors. Repeat as necessary.

**DO NOT SPRAY ON ANIMALS.** Old bedding should be removed and replaced with lean, fresh bedding after treatment. Also treat dogs and cats with a registered flea and tick control product before allowing them to enter treated area.

**Not for Use in USDA Meat and Poultry Plants.**

EPA Reg. No. 11716-104

EPA Est. No. 11716-TM-1

**Manufactured by  
Speer Products, Inc.**

**P.O. Box 18093  
Memphis, TN 38181-0993**

c:/mspub/reg184a.pub (11/14/97)  
Amendment to add Efficacy Claims  
Contains notifications dated 8/4/97, 7/22/97, 7/10/97

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