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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

JUN 6 2003

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

Subject: Label Amendment Updating First Aid and Disposal Statements in  
Accordance with PR Notices 2001-1 and 2001-6  
Speer Flea & Tick Spray III  
EPA Reg. No.: 11715-195  
Your Submission Dated April 8, 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 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. Move the following statement which is currently located in the Hazards to Humans & Domestic Animals section to the Directions for Use:

"Remove pets and birds and cover fish aquaria before surface applications."

2. Move the following statements which are currently located in the Hazards to Humans & Domestic Animals section to the Directions for Use "On Dogs":

"Sensitivities may occur after using ANY pesticide product for pets. If signs of sensitivity occur, bathe your pet with mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately."

3. Based on the cited toxicology studies supporting this registration, this product has been classified in acute toxicity category IV by all routes of exposure. Accordingly, the heading "Hazards to Humans & Domestic Animals" and the following statements should be deleted from the "Precautionary Statements:

"Harmful if swallowed. May be absorbed through skin. Avoid inhalation of spray mist. Avoid contact with skin, eyes or clothing. Avoid breathing spray mist."

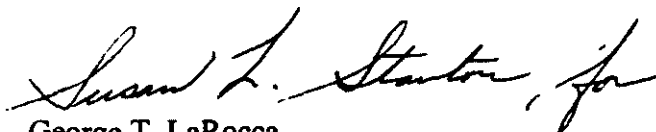
You may also delete the First Aid statements, since these are not required for category IV products. However, EPA has no objections if you wish to retain them.

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4. Under Environmental Hazards, revise the statement prohibiting applications to water as recommended in PR Notice 93-8 for residential use products: "Do not apply directly to water."

If you have any questions regarding this action, please contact Susan Stanton of my team at (703) 305-5218.

Sincerely,



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

Enclosure

# SPEER

## FLEA & TICK SPRAY III

### MULTI-PURPOSE INSECTICIDE SPRAY

- For Domestic Use Only both Indoors and Outdoors
- A Ready-To-Use PERMANONE Stable Emulsion Insecticide
- For Control of Fleas, Brown Dog Ticks, and Lice on Premises and on Dogs
- Controls Fleas and Ticks on Dogs for 35 Days
- Aids in Control of Ticks on Dogs for an Additional 2 Weeks

#### ACTIVE INGREDIENTS:

\*Permethrin.....0.50%

INERT INGREDIENTS:.....99.50%  
100.00%

\*(3-phenoxyphenyl) methyl (+/-)cis/trans 3-2,2-dichloroethenyl)  
2,2-dimethylcyclopropanecarboxylate. Cis/trans ratio: min. 35%  
(+/-) cis and max 65% (+/-) trans.  
PERMANONE - Registered Trademark of Agrevo Environmental Health

**KEEP OUT OF REACH OF CHILDREN**

#### CAUTION

See back panel for additional precautions

NET CONTENTS: \_\_\_\_\_

**ACCEPTED  
with COMMENTS  
In EPA Letter Dated:**

EPA REG. NO 11715-195  
EPA EST. NO. 11715-TN-1

JUN 6 2003

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

11715-195

**READ ENTIRE LABEL BEFORE EACH USE**  
**USE ONLY ON DOGS, HORSES, CATTLE**  
**(BEEF AND DAIRY), GOATS, SHEEP,**  
**AND HOGS**

#### PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS & DOMESTIC ANIMALS CAUTION

Harmful if swallowed. May be absorbed through skin. Avoid inhalation of spray mist. Avoid contact with skin, eyes or clothing. Avoid breathing spray mist. Wash thoroughly after handling and before smoking or eating. Avoid contamination of feed and foodstuffs. Remove pets and birds and cover fish aquaria before surface applications. Do not use on humans. Do not allow children or pets to contact treated areas until surfaces are dry. Sensitivities may occur after using ANY pesticide product for pets. If signs of sensitivity occur, bathe your pet with mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately.

FIRST AID	
<b>IF SWALLOWED:</b>	<ul style="list-style-type: none"> <li>• Call poison control center or doctor immediately for treatment advice.</li> <li>• Have person sip a glass of water if able to swallow.</li> <li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>

<b>IF ON SKIN OR CLOTHING:</b>	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>IF INHALED:</b>	<ul style="list-style-type: none"> <li>• Move person to fresh air.</li> <li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.</li> <li>• Call a poison control center or doctor for further treatment advice.</li> </ul>
<b>IF IN EYES:</b>	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>HOT LINE NUMBER</b> 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.	

#### ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not apply directly to water, or to areas where surface water is present, or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters.

## DIRECTIONS FOR USE

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

Affix trigger, pump or other type sprayer to container for application. do not transfer to another container.

## SHAKE WELL BEFORE USING

### INDOOR APPLICATION

For spot application only. Do not use as a space spray indoors.

### SURFACE SPRAYING:

**To Control Cockroaches, Waterbugs, Palmetto Bugs, Scorpions, Millipedes, Centipedes, Sowbugs, Pillbugs, Ants, Silverfish, Firebrats, Spiders, Crickets, Clover Mites, Cheese Mites, Granary Weevils, Rice Weevils, Confused Flour Beetles, Rust Red Flour Beetles, Drugstore Beetles, Meal Worms, Grain Mites and Cadellles:** Direct the spray into hiding places, cracks and crevices, and behind shelves and drawers. For silverfish, spray bookcases. For ants, spray trails, nests and points of entry.

**To Control Carpet Beetles:** Spray edges of carpeting and under carpeting and rugs. Make localized application to floor and baseboards. Spray directly into cracks, crevices and infested areas of shelving. Repeat treatment as needed.

**To Control Bedbugs:** Spray mattresses lightly, particularly around tufts and seams. Take beds apart and spray in all joints. Treat baseboards, moldings and floors. Repeat treatment as needed.

**To Control Fleas (Adults and Larvae) and Ticks (Adults and Larvae):** Thoroughly spray infested areas, pet beds, resting quarters, nearby cracks and crevices, along and behind baseboards, moldings, window and door frames, and entire areas of floor and floor covering. Fresh bedding should be placed in animal quarters following treatment. Repeat treatment as needed. Allow to dry thoroughly before allowing pets to contact

treated areas.

**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 areas may be treated lightly, keeping nozzle at least three feet from fabric to avoid staining.

**To Kill Lice and Louse Eggs:** Spray in an inconspicuous area to test for possible staining or discoloration. Inspect again after drying, then proceed to spray entire area to be treated. Spray from a distance of 8 to 10 inches. Treat only those garments and parts of bedding, including mattresses and furniture that cannot be either laundered or dry cleaned. Allow all treated articles to dry thoroughly before use. Not for use on humans for lice control.

### ON LIVESTOCK

**To Protect Cattle (Beef and Dairy), Goats, Sheep, Hogs and Horses from Horn Flies, Face Flies, House Flies, Mosquitoes and Gnats:** Apply a light mist sufficient to wet the surface of the hair. For face flies, spray face and head, but do not spray into eyes.

**To Control Stable Flies, Horse Flies and Deer Flies:** Apply at a rate of 2 ounces per adult animal, sufficient to wet the hair thoroughly. Repeat treatment daily or at intervals necessary to give continued protection.

**To Control Blood-Sucking Lice:** Apply to the infested areas of the animal, using a stiff brush to get the spray to the base of the hair. Repeat every 3 weeks if required.

**To Control Poultry Lice:** Spray roosts, walls and nests or cages thoroughly. This should be followed by spraying over the birds with a fine mist.

**To Control Bedbugs and Mites in Poultry Houses:** Spray crevices of roost poles, cracks in

walls, and cracks in nests where the bedbugs and mites hide.

### ON DOGS

**To Control Fleas, Ticks, and Lice:** Start spraying at the tail, moving the dispenser rapidly and making sure that the animal's entire body is treated, including the legs and underbody. While spraying, fluff the hair so that the spray will penetrate to the skin. Make sure spray wets thoroughly, but do not saturate animal. Do not spray into eyes or face. Avoid contact with genitalia. Use protective gloves or mitts when applying product. Do not repeat treatment for one week. Do not use on puppies less than 12 weeks old.

**Consult a veterinarian before using this product on debilitated, aged, pregnant or nursing animals, or animals on medication.**

**NOTE: DO NOT USE ON CATS OR KITTENS.**

### OUTDOOR APPLICATION

#### For Control of Garden Insects:

For use on roses, dahlias, asters and other ornamentals to kill Japanese Beetles hit by spray as well as Whiteflies, Aphids, Exposed Thrips, Spiders, Red Mites and Leafminers. May be used on plants as a multi-purpose spray in small gardens and for spot treatments of incipient insect infestations to prevent spreading in large garden areas.

May also be used on other plants such as African violets, asters, azaleas, begonias, camellias, carnations, chrysanthemums, dahlias, delphiniums, dogwoods, English ivy, euonymus, fuschia, geraniums, crassula, grape vines, Kentia palms, laurels, marigolds, rhododendrons, roses, rubber plants, snapdragons, stocks, wandering Jews and zinnias.

Effective when used as directed against Whiteflies, aphids, Spider and Red Mites, Exposed Thrips,

Lace Bugs, Japanese Beetles, Pavement Ants, Clover Mites and Armyworms. When spraying plants, do not operate closer than 18 inches. Use sweeping motion. Be cautious about wetting tender foliage, young plants and new growth. Do not spray plants when temperatures exceed 90 degrees F. Contact insects directly whenever possible. Repeat treatment as infestations occur.

**STORAGE AND DISPOSAL**

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

**DISPOSAL: If empty:** Do not reuse this container. 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. Never place unused product down any indoor or outdoor drain.

**MANUFACTURED BY:  
SPEER PRODUCTS, INC.  
4242 B.F.GOODRICH BLVD.  
MEMPHIS, TN 38118**

Buyer assumes all risks of use, storage or handling of this product not in strict accordance with directions given herewith.

In case of emergency or for product use information call (901)362-1950, Monday - Friday, 7:30 a.m. - 4:30 p.m. CST (distributors may elect to use their own phone numbers and hours of operation).

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