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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

JAN 13 2004

Ms. Jean Butler
Regulatory Affairs Assistant
Speer Products, Incorporated
4242 B. F. Goodrich Blvd
P.O. Box 18993
Memphis, TN 38118

Subject: Amendment - Revised Final Label-First Aid and Disposal Statements
SPI Residual Pressurized Spray I
EPA Registration No. 11715-196
Your Submission Dated April 8, 2003

Dear Ms. Butler:

The amendment referred to above, submitted in connection with registration under section 3 (c)(5) of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable, subject to the comments listed below.

1. Under the "Precautionary Statements" section, move the following statements to your "Directions for Use" section: "Avoid contamination of ...classrooms are in use." Revise the "Wash with...use" statement to read "Wash thoroughly with soap and water after handling." Delete the statements "In case of...water" and "Obtain medical...persists."
2. Revise your "Spray surfaces until wet" statement to read "Spray surfaces until wet but not to the point of runoff."
3. Either delete the phrases "Repeat as necessary", "Repeat as needed" and "Repeat treatment as necessary" or indicate a time period based on the residual efficacy of your product.
4. Add the following statement to the end of the tick and flea section: "Also, treat your yard with a product registered for yard application."
5. Add the following statements to the "Directions for Use" section after the "Do not apply in classrooms when in use" statement: "Do not apply this product in occupied patient rooms or in any rooms/areas while occupied by patients, the elderly or infirm. Do not apply to institutions (including libraries, sports facilities, etc.,) in the immediate area when occupants are present."

6. Add the following precaution to the paragraph under Flies and Mosquitoes "Remove all exposed food and cooking utensils. Cover all food handling surfaces or wash thoroughly after treatment and before use. Do not use on edible crops."

A stamped copy of the label is enclosed for your records. If you have any questions, please call Dr. William Sproat of my team at 703-308-8587.

Sincerely,



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

Enclosure

SPEER RESIDUAL PRESSURIZED SPRAY I

PRESSURIZED SPRAY - RESIDUALLY KILLS
Ants, Cockroaches, Ticks, Fleas, and
Other Listed Insects.

For Use In Homes And Non-Food Areas Of
Kennels, Commercial Buildings: Warehouses,
Theatres, Office Buildings, Schools, Motels,
Hotels, Restaurants, Food Processing Facilities.

ACTIVE INGREDIENTS:

D-trans allethrin 0.054%
Permethrin[*-(3-Phenoxyphenyl)methyl(±)cis-
trans-3-(2,2-dichloroethenyl)2,2-
dimethylcyclopropanecarboxylate]..... 0.220%
N-Octyl bicycloheptene dicarboximide**...0.250%
OTHER INGREDIENTS..... 99.476%
100.00%

*cis-trans isomer ratio: min. 35% (±)cis Max .65%
(±)trans
**MGK® 264, Insecticide Synergist
MGK-Registered trademark of McLaughlin Gormley King Co.

KEEP OUT OF REACH OF CHILDREN

CAUTION

See additional precautionary statements on
back panel.

NET CONTENTS: _____

EPA Reg. No. 11715-196
EPA Est. No. 11715-TN-1

ACCEPTED
with COMMENTS
in EPA Letter Dated

JAN 13 2004

Under the Federal Insecticide,
Fungicide, and Herbicide Act
as amended, for the pesticide
registration number 11715-196.

11715-196

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Harmful if swallowed, absorbed through the skin. Do not breathe vapors or spray mist. Avoid contact with skin or eyes. In case of contact flush with plenty of water. Wash with soap and warm water after use. Obtain medical attention if irritation persists. Avoid contamination of food or foodstuffs.

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 maybe prepared or held. In home, cover all food handling surfaces and cover or remove all food and cooking utensils, or wash thoroughly after treatment.

Non-food/feed areas of 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).

Remove pets, birds, and cover fish aquariums before spraying. Do not allow children or pets to contact treated surfaces until spray has dried. Do not use in classrooms when in use.

FIRST AID

IF SWALLOWED:	<ul style="list-style-type: none">• Call poison control center or doctor immediately for treatment advice.• Have person sip 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.
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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 INHALED:	<ul style="list-style-type: none">• 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.
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.
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.	

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not apply directly to any body of water. Do not contaminate water when disposing of equipment washwaters.

PHYSICAL OR CHEMICAL HAZARDS

Contents under pressure. Keep away from heat, sparks, and open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

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DIRECTIONS FOR USE

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

SHAKE WELL BEFORE USE

GENERAL: Use this spray as a spot or crack and crevice treatment to control cockroaches, fleas, silverfish, ticks, waterbugs, and other insects listed below. Apply this product only as a coarse spray or crack and crevice treatment to localized areas where pests are found or may occur. Spray surfaces until wet. Repeat as needed.

Do not use as a space spray.

Not for use in USDA Meat and Poultry Plants.

FOR SPOT TREATMENT

To Kill Ants, Cockroaches, Crickets, Silverfish Spiders, Sowbugs, and Carpet Beetles: Spray areas where these insects are found or may hide, including dark corners of rooms and closets; cracks and crevices in walls; along baseboards and door and window frames; behind and beneath sinks, stoves, refrigerators, and cabinets; and around garbage cans, plumbing, and other utility installations. Pests driven out of hiding places should be sprayed directly. For ants, apply to ant trails, also around doors and windows, and wherever else these pests may find entrance. Repeat as necessary.

To Kill Brown Dog Ticks and Fleas: Thoroughly apply as a spot treatment to infested areas such as pet beds and resting quarters, nearby cracks and crevices, along and behind baseboards, window and door frames, and localized areas of floor and floor coverings where these pests may be present. Old bedding should be removed and replaced with clean, fresh bedding after treatment. **DO NOT SPRAY PETS WITH THIS PRODUCT.**

FOR CRACK AND CREVICES

To Kill Ants, Cockroaches, Crickets, Silverfish, Sowbugs, Spiders, Brown Dog Ticks, Fleas, and

Carpet Beetles: Apply spray in small amounts directly into cracks and crevices. Spray should be directed into points between different elements of construction, between equipment and floors, openings leading to voids and hollow spaces in walls, equipment legs and bases where these insects hide.

Care should be taken to avoid depositing the product onto exposed surfaces or introducing the material into the air. Avoid contamination of food or food handling surfaces.

Flies and Mosquitoes: Use only outdoors as an aid in reducing annoyance from these insects. Spray outside surfaces of window and door frames as well as other areas where these pests may enter the home. Also spray dark corners and localized resting areas (such as under eaves) or porches, patios, and garages where these insects may congregate. Flies and mosquitoes coming to rest on treated surfaces will be killed. Repeat treatment when necessary.

STORAGE AND DISPOSAL

STORAGE: Store in a cool, dry place. Keep container closed.

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.

[Distributors may choose their own emergency number and time of operation.]

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

Netserver/Reg./SPLabels-11715-196-NOTIF-2001-1&6(4-08-03)