



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

July 18, 2003

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

Subject: Label Amendment - Updating First Aid Statement in Accordance with PR Notice 2001-1, Disposal Instructions conforming to PR Notice 2001-6
Speer Py-Perm Aqueous Insect Killer #5
EPA Reg. No. 11715-247
Your Submission Dated April 10, 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. Revise front of the label-- replace " Inert Ingredients" with the phrase "Other Ingredients".
2. Delete all "Repeat treatment as necessary" statements or indicate the repeat interval which should be based upon the residual effectiveness of the product.
3. On the front panel, fourth bullet replace "Fruit Fleas" with "Fruit Flies".
4. As we requested in your notice of registration (June 16, 1994), column 14b for sodium benzoate of the Confidential Statement of Formula should be corrected and resubmitted. Column 14b, which is the certified limits % by weight (lower limit) is higher than column 13b and 14a certified limits % by weight (upper limits).
5. Delete the paragraph "For Animal Application". It appears to be identical to the instructions for Livestock Use, instead it uses the unqualified term "animal".

6. Add a bullet to the front panel indicating the product is for use on livestock and livestock premises.

If you have any questions regarding this action, please contact BeWanda Alexander of my team at (703) 305-7460.

Sincerely,

A handwritten signature in cursive script that reads "BeWanda Alexander for".

George T. LaRocca

Product Manager (13)

Insecticide Branch

Registration Division (7505C)

SPEER PY-PERM AQUEOUS INSECT KILLER #5

- For household and commercial/Industrial use
- Contains Pyrenone and Permanone
- Controls residential, industrial, and garden insects
- A broad spectrum insecticide highly effective against Ants, Bedbugs, Booklice, Carpenter Ants, Bees, Carpet Beetles, Centipedes, Cigarette Beetles, Clover Mites, Cluster Flies, Cockroaches, Confused Flour Beetles, Crickets, Drug Store Beetles, Fleas, Flies, Fruit Fleas, Gnats, Grain Mites, Granary Weevils, Horn Flies, House Flies, Lice, Millipedes, Mosquitoes, Mud Daubers, Red Flour Beetles, Rice Weevils, Sawtoothed Grain Beetles, Silverfish, Small Flying Moths, Sowbugs, Spiders, Stable Flies, Ticks, and Wasps

ACTIVE INGREDIENTS:

Pyrethrins0.250%

*Piperonyl Butoxide, Technical.....1.250%

**Permethrin.....0.125%

INERT INGREDIENTS:***.....98.375%

100.000%

*Equivalent to 1.08% (Butylcarbityl) (6-propyl piperonyl) ether and 0.25% related compounds

**(3-phenoxyphenyl) methyl (±) cis/trans 3-(2,2-dichloroethenyl)2,2-dimethylcyclopropanecarboxylate.

Cis/trans ratio: min. 35% (±)cis and max. 65% (±)trans.

***Contains petroleum distillates.

Pyrenone and Permanone- - Registered trademark of Roussel Uclaf Corp.

KEEP OUT OF REACH OF CHILDREN

CAUTION

See side panel for additional precautions.

NET CONTENTS

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS CAUTION

Harmful if inhaled. Causes skin irritation. Do not get on skin or clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse. Avoid contamination of feed and foodstuffs. Remove pets and birds and cover fish aquaria before spraying. Vacate room after treatment and ventilate before reoccupying. Do not allow children or pets to contact treated areas until surfaces are dry. Not for use on dogs or cats.

FIRST AID

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.

IF ON SKIN OR CLOTHING:

- 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 SWALLOWED:

- Immediately call a poison control center or doctor.
- Do not induce vomiting unless to do so by a poison control center or doctor.
- Do not give any liquid to the person.
- Do not give anything by mouth to an unconscious person.

IF IN EYES:

- 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.

NOTE TO PHYSICIAN

Contains petroleum distillates- vomiting may cause aspiration pneumonia.

PHYSICAL OR CHEMICAL HAZARDS

Contents under pressure. Do not use or store near heat or open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F. may cause bursting. Do not apply this product in conduits, motor housing, junctions and switch boxes or other electrical equipment because of possible shock hazard. Do not use on surfaces than can be harmed or stained by water.

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.

For use in and around non food/feed areas of (but not limited to) Beef Cattle Operations, campgrounds, canneries, dairy farms (including milk house, milk parlor, loading sheds, and holding lot), food storage areas, hog operations, homes, horse barns and stables, hospitals (non-occupied patient areas), hotels, kennels.

EPA Reg. No. 11715-247 EPA Est. No. 11715-TN-1

ACCEPTED
with COMMENTS
In EPA Letter Dated
JUL 18 2003

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

11715-247

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motels, poultry operations, resorts, restaurants and other foodhandling establishments, schools, super-markets, utilities, vehicles, warehouses, and other commercial and industrial buildings.

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, all food processing surfaces and utensils should be covered during treatment or thoroughly washed before use. Exposed food should be covered or removed.

Non-food 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).

Do not use in rooms/areas while occupied by patients, the elderly or infirm. Do not apply to classrooms when in use.

SHAKE WELL BEFORE USING

Remove protective cap, hold container upright and spray a distance of 12 to 15 inches. Remove birds and cover fish aquariums before spraying.

NON-AGRICULTURAL USES

Cluster Flies, Houseflies, Fruit Flies, Mosquitoes, Gnats, Wasps, Hornets, Bees, Black Flies, Skipper Flies, Blow Flies, and Small Flying Moths: Close all doors and windows and direct spray at the rate of 1 to 3 seconds per 1000 cubic feet, moving toward the door. Fill room with mist. Direct spray to all parts of the room, especially windows and other light sources which attract these insects. Keep nozzle in constant motion. Leave room and keep closed for 15 minutes after spraying. Open and ventilate before reoccupying. Sweep up and discard fallen insects. Repeat treatment as necessary.

Ants, Cockroaches, Waterbugs, Palmetto Bugs, Silverfish, Firebrats, Crickets, Scorpions, Spiders, Millipedes, Centipedes, Sowbugs, and Pillbugs:

Spray into hiding places such as cracks and crevices, behind sinks, cabinets, meter boxes, door frames, windows, along baseboards and floors, around drains and plumbing, hitting insects with spray whenever possible. **Space Spray:** Open cabinets and doors in area to be treated. Shut off air conditions, fans and close doors and windows before spraying. Spray at rate of 20 seconds per 1000 cubic feet of space, moving toward the door. Direct spray toward area suspected of harboring the greatest insect infestations. Disperse in all locations contacting as many insects as possible. Leave room and keep area closed for 15 minutes. Open and ventilate before reoccupying. Sweep up and discard fallen insects. Repeat treatment as necessary.

Indian Meal Moths, Chocolate Moth, Mediterranean Flour Moth, Angoumois Grain Moths: Close doors and windows, direct spray into all parts of room especially around stored food product containers, pallets and darkened areas. Spray 7 to 10 seconds for each 1000 cubic feet of space, moving toward the door. Leave room and keep area closed for 15 minutes following treatment. Open and ventilate before reoccupying. Sweep up and discard fallen insects. Repeat application weekly or as necessary.

Exposed stages of Confused Flour Beetles, Cigarette Beetles, Drug Store Beetles, Saw-Toothed Grain Beetles, Red Flour Beetles, Rice Weevils, Granary Weevils, Grain Mites in exposed adult and larvae stages: Spray into cracks and crevices, processing and handling equipment around cartons or containers or other areas where these insects tend to congregate. Spray 30 seconds for each 100 square feet of surface. Keep area closed for 45 minutes to 1 hour after treatment. **Space Spray:** Spray 20 seconds per 1000 cubic feet of space, moving toward the door. Leave room and keep area closed for 15 minutes following treatment. Repeat application weekly or as necessary. Infested stored food products in the home should be disposed of, or treated using an approved product intended for this purpose.

Carpet Beetles: Spray directly on beetles, floors,

baseboards, shelves and carpets. Repeat treatment as necessary.

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

To control clothes Moths and Carpet Beetles on wool and other proteinaceous fibers: Remove 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 by spraying lightly, keeping nozzle at least three feet from fabric to avoid staining.

Mud Daubers and Wasp Nests: Spray mist directly on insects and their nests from approximately 2 feet away. Contacted insects will fly away from fog. Applications should be made in late evening when insects are at rest. Spray into hiding and breeding places contacting as many insects as possible.

Fleas in Buildings- Directed spray: Hold can 36 inches above floor and direct spray toward floor and lower walls at a rate of 10 seconds per 100 square feet making sure that all floor, sofa and chair surfaces are contacted. Leave room and keep area closed for 15 minutes. Open and ventilate before reoccupying. Allow all sprayed articles to dry thoroughly before use. Repeat treatment after 7 days or as needed.

Ticks (Adults and Larvae): Remove and thoroughly clean or destroy pet bedding. Spray pet sleeping quarters, bed, entire floor and floor covering, with special attention to cracks and crevices around baseboards, and window and door frames. Infested upholstered furniture may also be treated with this product. A test application should be made to upholstery or drapery fabrics in an inconspicuous place before use.

AGRICULTURAL USES

To control **bees, deer flies, face flies, fleas, gnats, horn flies, hornets, horse flies, house flies, lice,**

mosquitoes, small flying moths, stable flies, ticks, and wasps:

IN DAIRY FARMS

MILKING PARLOR AND MILK ROOM: Cover milking utensils and milk to prevent contamination from spray and falling dead insects. Close windows and doors and direct fog upward in all directions at a rate of 1 to 3 seconds per 1000 cubic feet of space, moving toward the door. Leave room and for best results, keep area closed for 15 minutes after spraying. Do not remain in treated area. Ventilate room after treatment is completed.

LIVESTOCK USE (DO NOT USE ON SICK ANIMALS)-

From approximately 2 feet away, thoroughly spray entire animal as it is being released to pasture. Do not spray directly toward animal's eyes. Spot treat withers, shoulders and back where saliva accumulates from head tossing. Apply for 2 to 4 seconds per animal. Repeat daily or as needed. **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.

IN STANCHION BARNs: Walk behind animals and direct spray over backs allowing 1 second per animal. Apply each morning for best results.

IN BEEF, CATTLE, GOAT, AND SHEEP OPERATIONS, HORSE BARNs AND STABLEs: Close all windows and doors, and spray at a rate of 1 to 2 seconds per 1000 cubic feet. If area cannot be closed, double the dosage. Leave room and keep area closed for 15 minutes following application. Ventilate area after treatment is complete.

FOR ANIMAL APPLICATION (DO NOT USE ON SICK ANIMALS)- From approximately 2 feet away, thoroughly spray entire animal, preferably as it being released to pasture. Do not spray directly toward animal's face or eyes. Apply for 2 to 4 seconds per animal. Repeat daily or as needed. **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.

IN POULTRY OPERATIONS: Use only in unoccupied poultry houses when birds are not present. Close all windows and doors, and spray at a rate of 1 to 2 seconds per 1000 cubic feet, moving toward the door. If area cannot be closed, double the dosage. Leave room and keep area closed for 15 minutes following application. Ventilate area after treatment is complete. Treat daily or as needed.

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.

For control of Bedbugs and Mites in Poultry Houses, spray crevices of roost poles, cracks in walls, and cracks in nests where the bedbugs and mites hide.

IN HOG OPERATIONS: Close windows and doors and direct fog upward in all directions at a rate of 1 to 2 seconds per 1000 cubic feet of space, moving toward the door. If area cannot be closed, double the dosage. Leave room and for best results, keep area closed for 15 minutes after spraying. Do not remain in treated area. Open and ventilate after treatment is completed.

HOG APPLICATION (DO NOT USE ON SICK ANIMALS):

From approximately 2 feet away, thoroughly spray entire animal as it is being released to pasture. Do not spray directly toward animal's face or eyes. Spot treat withers, shoulders and back where saliva accumulates from head tossing. Apply for 1 to 2 seconds per hog. Repeat daily or as needed. Do not ship for slaughter within 5 days of last treatment. **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.

STORAGE AND DISPOSAL

STORAGE: Store in a cool, dry area. Do not use or store below 32°F.

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
4242 B. F. GOODRICH BLVD.
MEMPHIS TN 38118

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

Netserver/Reg./SPILabels11715-247-NOTIF-2001-1&6(4-10-03)