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11 715-252

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

NOV 8 1996

Mr. Bill Washburn
 Speer Products Inc.
 4242 B.F. Goodrich Blvd.
 P.O. Box 18993
 Memphis TN 38118

Dear Mr. Washburn:

Subject: 8 Month Response to Silicon Dioxide/Silica Gel
 Reregistration Eligibility Document (RED)
 6 Month Insect Powder
 EPA Registration Number 11715-252
 Your Letter Dated April 26, 1995

The amendment referred to above, submitted in connection with registration under FIFRA sec. 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 sec. 3(c)(5) or FIFRA sec. 4 when the Agency requires all registrants of similar products to submit such data.

2. Based on the acute toxicity profile of the referenced product, EPA Reg. No. 4816-353, make the following label changes:

- a. Revise the Hazards to Humans and Domestic Animals to read:

Harmful is absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling. Containers larger than one pound may not be used or stored in food handling establishments.

- b. Add a Statement of Practical Treatment and Note to Physician to the label as follows:

Statement of Practical Treatment

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

IF IN EYES: Flush with plenty of water. Call a physician if irritation persists.

Note to Physician: May pose an aspiration pneumonia hazard.

SYMBOL							
SURNAME							
DATE							

3. Revise the Environmental Hazards Statement to read as follows:

This product is toxic to fish. Do not apply directly to water. Do not contaminate water when disposing of equipment washwater or rinsate.

4. Revise the Storage and Disposal section as follows:

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

Pesticide Disposal: Pesticide or rinse water that cannot be used according to label instructions must be disposed of at or by an approved waste disposal facility.

Container Disposal: Securely wrap original container in several layers of newspaper and discard in trash.

5. Under the directions for use add the following statement:

Do not apply to classrooms when in use. Do not apply this product in patient rooms while occupied or any rooms while occupied by the elderly or infirm.

6. Submit two 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 sec. 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 yours,

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

Enclosure

3 7 6

6 MONTH INSECT POWDER

PROVIDES QUICK CONTROL
KILLS UP TO 6 MONTHS WHEN LEFT UNDISTURBED

For Industrial and Commercial Use Only

Non-staining and relatively odorless. For use in residences, institutions, food plants, granaries and on cats and dogs.

Controls Ants, Cockroaches (including the Asian cockroach), Silverfish, Bedbugs, Fleas, Lice, Bees and (as stipulated in the use directions) on numerous stored product pests. May also be used to protect against entrance of drywood termites.

ACTIVE INGREDIENTS:

Pyrethrins.....	1.0%
*Piperonyl Butoxide, Technical.....	10.0%
Amorphous Silica Gel.....	40.0%
**INERT INGREDIENTS:.....	49.0%
	<u>100.0%</u>

*Equivalent to 8.0% (butylcarbityl) (6-propylpiperonyl) ether and 2.0% related compounds.

**Contains Petroleum Distillate.

KEEP OUT OF REACH OF CHILDREN

CAUTION

SEE BACK PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

MANUFACTURED BY:

RSR LABORATORIES, INC.
501 FIFTH STREET, BRISTOL, TENNESSEE 37620

EPA Est. No. 51793-TN-1

EPA Reg. No. ~~51793-43~~

NET CONTENTS _____ OZ

11715-252

NOV 8 1996

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

11715-252

DIRECTIONS FOR USE

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

APPLICATION WITHIN FOOD AREAS

Food processing plants and warehouses, bakeries, beverage plants, restaurants, supermarkets, meat and poultry processing plants, hotels, motels, hospitals and schools.

LIMIT TO CRACK AND CREVICE TREATMENT ONLY. Using a bulbous duster, apply a small amount of material directly into cracks and crevices such as expansion joints between different elements of construction or between equipment bases and the floor, wall voids, motor housing, junction boxes or switch boxes, conduits or hollow equipment legs where cockroaches, ants, silverfish, spiders, boxelder bugs and crickets 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 processing surfaces.

APPLICATIONS OF THIS PRODUCT IN THE FOOD AREAS OF FOOD HANDLING ESTABLISHMENTS, OTHER THAN AS A CRACK AND CREVICE TREATMENT, ARE NOT PERMITTED.

NON-FOOD AREAS

Homes, institutions, hospitals, office buildings, hotels, motels, theaters, schools, warehouses, truck trailers and railroad cars.

To control crawling insects such as ants, cockroaches, silverfish, firebrats, spiders, boxelder bugs, ticks, lice and fleas in animal quarters, distribute at the rate of 2 ounces per 100 square feet of surface area. Apply a continuous visible film underneath and behind stairs, refrigerators and appliances. Treat on, around and behind moldings, shelving, baseboards, pipe openings, cracks, crevices and other areas where insects hide. For severe infestations, apply behind cabinets and walls, in crawl spaces and attics at the rate of 16 ounces per 1000 square feet of surface area. Repeat treatment as necessary.

STORED PRODUCT PESTS: To aid in the control of cadelles, cheese mites, cigarette beetles, confused flour beetles, dark meal worms, drugstore beetles, grain mites, granary weevils, red flour beetles, rice weevils, sawtoothed grain beetles and yellow meal worms in mills, elevators and granaries. Clean up waste materials, dust, dirt and any other debris. Thoroughly treat floors, walls, and other surfaces in bins, storage and handling areas. Apply into cracks and crevices and other difficult to reach areas where insects may hide.

BEEES AND WASPS: It is generally advisable to treat wasp and bee nests in the evening when insects are less active and have returned to the nest. Using hand or power duster or other suitable means, with extension tubes if necessary, thoroughly dust nest and entrance and surrounding areas where insects alight. Nests in wall voids can be located by listening with your ear against the wall. Drill a hole in the area, blow dust in and reseal. For

ground wasps, dust entrance and surrounding areas. For best results, check nests carefully one or two days after treatment to ensure complete kill, then remove and destroy nest to prevent emergence of newly-hatched insects. If removal is not feasible, retreat the nest, if necessary. Do not use this product to treat overhead nests.

SEWER TREATMENTS: American and Oriental cockroach infestations in sanitary sewers may be treated with approximately 6 ounces per manhole. When treating sewers, one manhole per 200 feet of line should be treated. Treatments are made by removing the manhole cover and replacing with a disc of plywood bored to receive the usual flexible hose from portable or truck-mounted ventilating equipment, 6 ounces is introduced into the ventilating air to be dispersed quickly and thoroughly through the system.

BEDBUGS: Take bed apart. Dust into joints and channels. If hollow, such as square or round tubing, see that the interior or framework is well dusted. Mattresses should be dusted, especially tufts, folds and edges. Picture frame moldings and all cracks and crevices in the room should be treated.

DRYWOOD TERMITES: To protect against entrance, using an electric or hand operated rotary duster, distribute through an entry, e.g. crawl hole into attic and crawl space of building, at a rate of 1 pound per 1000 square feet of floor area. All vents and blowers on the windward side should be closed. All wood surfaces should be covered. In case of localized infestations, probe to locate galleries and drill holes to inject into the galleries. If a reasonably heavy infestation has already developed, fumigation should be employed.

FLEAS - DOGS AND CATS: Liberally apply powder to the animal, rubbing thoroughly to the skin. Begin with the neck and include the underbody, legs, feet and the base of the tail. Repeat as necessary. Surfaces of kennels should be dusted at the rate of one ounce per 50 square feet. Heavily infested lawns, basements and crawl spaces should be dusted at the rate of 16 ounces per 1000 square feet. Repeat as necessary. Do NOT treat kittens or puppies less than four weeks old.

SOWBUGS, PILLBUGS, GROUND BEETLES, EARWIGS, MILLIPEDES, CENTIPEDES and SCORPIONS: Apply around doors and windows and other places where these pests may enter premises. Treat baseboards, storage areas and other locations where these pests are found.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal. Securely wrap original container in several layers of newspaper and discard in trash.

This container is filled by weight, not by volume. You can be assured of the proper weight even through some settling of contents normally occurs during transportation and handling.

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PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS & DOMESTIC ANIMALS
CAUTION

Avoid inhalation. Containers larger than one pound may not be used or stored in food handling establishments.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Keep out of lakes, streams or ponds. Do not apply where runoff is likely to occur. Do not apply when weather conditions favor drift from areas treated. Do not contaminate water by cleaning of equipment or disposal of wastes.