



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

JUN 25 2003

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

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
6 Month Insect Powder
EPA Reg. No.: 11715-252
Your Submission Dated April 15, 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 statements from the Hazards to Humans and Domestic Animals section to the Directions for Use on dogs and cats:

"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."

2. Correct the spelling of "manhole" in the third line of the directions for "Sewer Treatments"; and correct the spelling of "agency" in the first line of the disposal instructions for "partly filled" containers.

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

Sincerely,

A handwritten signature in cursive script that reads "Susan L. Stanton, for".

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

Enclosure

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.

Control 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%
100.00%

* 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

NET CONTENTS

EPA Reg. No. 11715-252
EPA Est. No. 11715-TN-1

ACCEPTED
with COMMENTS
In EPA Letter Dated:

JUN 25 2003

**Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
11715-252**

**READ ENTIRE LABEL BEFORE EACH USE
(For On Animal Uses)
USE ONLY ON DOGS & CATS**

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS CAUTION

Harmful if absorbed through the 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. 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	
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 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.	
NOTE TO PHYSICIAN AND VETERINARIAN	
Contains petroleum distillate- vomiting may cause aspiration pneumonia.	

ENVIRONMENTAL HAZARDS

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

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.

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 infirmed.

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 area. 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:

Liberal 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. Do not repeat treatment for one week.

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

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 twelve 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.

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.

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

IN CASE OF EMERGENCY CALL:

(901)-362-1950

(For Distributor Labels the phone number will vary)

**MANUFACTURED BY:
SPEER PRODUCTS, INC.**

**P. O. Box 18993
Memphis, TN 38181-0993**

C: MSPUB\REG252.PUB-(1-2-97)-11715-252-NOTIF-2001-1&6(4-15-03)