



11715-260

08/14/2003

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

AUG 14 2003

Mr. William L. Washburn
Regulatory Affairs Manager
Speer Products, Incorporated
4242 B. F. Goodrich Blvd
P.O. Box 18993
Memphis, TN 38118

Subject: Amendment - Revised First Aid and Disposal Statements
Speer Py-Perm Aqueous Insect Killer #8
EPA Registration No. 11715-260
Your Submission Dated April 17, 2003

Dear Mr. Washburn:

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 statements "Avoid contamination...surfaces are dry" to the "Directions for Use" section of your label.
2. Add the following statement to the "Directions for Use" section after the "Do not apply in classrooms when in use" statement: "Do not apply to institutions (including libraries, sports facilities, etc.) in the immediate area when occupants are present."
3. Either delete the phrases "Repeat as necessary...Repeat application as necessary... and Repeat treatment as necessary" or indicate a time period for retreatment based upon the residual efficacy of your product.
4. Either delete the phrase "Repeat application weekly if necessary to control infestations" or explain why this is necessary when your label states that your product controls fleas and ticks for 14 days.
5. Delete the phrase "No Unpleasant Odor." This is a subjective statement based on the sensitivity of the user.
6. Move the statements beginning with "Consult a veterinarian. . . , to the directions for use on dogs.

7. Add the following statement to the end of the tick and flea section: "Also, treat yard with a product registered for yard application."

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 PY-PERM AQUEOUS INSECT KILLER #8

- Contains Pyrenone® and Permanone®
- Seeks out bugs where they hide
- Controls industrial insects
- For commercial/agricultural use
- A broad spectrum insecticide highly effective against ants (including carpenter ants), bees, beetles (including carpet, flour, grain and ground beetles), centipedes, clover mites, cockroaches, crickets, (including mole crickets), earwigs, firebrats, fleas, millipedes, moths, pillbugs, scorpions, silverfish, sowbugs, spiders, ticks (including ticks which may cause lyme disease), wasps, and other pests listed on the label
- Kills lice and their eggs
- For use on bedding, furniture and other inanimate objects infested with lice
- For use on dogs and on premises to control fleas and ticks
- Controls fleas and ticks on dogs for 14 days
- Kills on contact
- Non-staining
- No unpleasant odor
- Water-based formula

ACTIVE INGREDIENTS:

Pyrethrins.....	0.20%
*Piperonyl Butoxide, Technical.....	1.00%
**Permethrin.....	0.40%
INERT INGREDIENTS:	98.40%
	100.00%

*Equivalent to min. 0.8% (butylcarbityl)(6-propylpiperonyl)ether and 0.2% related compounds.
 **(3-phenoxyphenyl) methyl (+/-) cis/trans. 3-(2,2-dichloroethenyl) 2,2-dimethylcyclopropanecarboxylate. Cis/trans ratio: min. 35% (+/-) cis and max. 65% (+/-) trans.
 Pyrenone® and Permanone® - Registered Trademarks of Roussel Uclaf Corporation.

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

See Rear Panel for Use Caution with COMMENTS
 in EPA Letter Dated

NET CONTENTS:

EPA REG. NO. 11715-260
 EPA EST. NO. 11715-TN-1

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

11715-260

AUG 14 2003

**READ ENTIRE LABEL BEFORE EACH USE
(for the domestic animal uses:
USE ONLY ON DOGS)**

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS & DOMESTIC ANIMALS

CAUTION

Harmful if inhaled. Avoid breathing vapor or spray mist. Remove contaminated clothing and wash before reuse. Avoid contamination of feed and foodstuffs. Remove pets, birds and cover ore remove fish bowls and aquariums before spraying. Do not allow children or pets to contact treated areas until surfaces are dry. **Do not use on cats. Do not use on puppies under 12 weeks.** Consult a veterinarian before using this product on debilitated, aged, pregnant or nursing animals, or animals on medication. 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 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.
HOT LINE NUMBER	
Have the product container or label with you when call 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 and other aquatic

organisms. Do not apply directly to water. Do not contaminate water by disposal of waste.

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 use this product in or near electrical equipment due to the possibility of shock hazard,

DIRECTIONS FOR USE

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

SHAKE WELL BEFORE USING

Do not apply directly to food. 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.

Nonfood 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).

Commercial food/feed areas where the product cannot be used include areas for receiving, serving storage, (Dry, Cold, Frozen, Raw) packaging (Cleaning, Slicing, Cooking, Grinding), edible waste storage, enclosed processing systems (Mills, Dairies, Edible Oils, Syrups).

Not for Use in Federally Inspected Meat and Poultry Plants.

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

Remove protective cap, hold container upright and spray from a distance of 12 to 15 inches.

INDOORS

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 upward into center of room with a slow sweeping motion. Spray 5-10 seconds for average room, moving toward the door. 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 area closed for 15 minutes after spraying. Ventilate room thoroughly before re-entry. Sweep up and discard fallen insects. Repeat treatment as necessary.

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, along baseboards and floors, around drains and plumbing, hitting insects with spray whenever possible. Repeat treatment as necessary.

Ants: Spray trails, nests and points of entry. Spray on ants where possible. Repeat as necessary.

Indian Meal Moths, 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. Ventilate room thoroughly before reentry. Repeat application as necessary.

Expose 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. Contact as many insects as possible. 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 cu. ft. of space, moving toward the door. Leave room and keep area closed for 15 minutes following treatment. Ventilate room thoroughly before reentry. Repeat application weekly or as necessary. Infested stored food products 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. Repeat treatment as necessary. Allow all sprayed articles to dry thoroughly before use.

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.

Fleas in buildings - Space spray: Hold can 36 inches above floor and direct spray toward floor and lower walls at a rate of 10 seconds per 100 sq. ft. 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. Repeat treatment after 7 days or as needed. Allow all sprayed articles to dry thoroughly before use.

Fleas & Ticks, including Ticks which may

cause Lyme disease (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 and mattresses may also be treated with this product. A test application should be made to upholstery or drapery fabrics in an inconspicuous place before use.

To Control Fleas, Ticks and Lice on dogs:

Starting at the tail, stroke against the lay of the hair, spraying the parted fur in short bursts, directly behind the hand to insure penetrating the coat. Dampen the fur back to the tail. Repeat application weekly if necessary to control infestations. **NOTE: USE ONLY ON DOGS. Not recommended for use on puppies less than 12 weeks old. DO NOT use on cats.**

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. Hold container upright with nozzle away from you. Depress valve and spray from a distance of 8 to 10 inches. Spray each square foot for three seconds. Spray only those garments and parts of bedding, including mattresses and furniture that cannot be either laundered or dry cleaned. Allow all sprayed articles to dry thoroughly before use.

IN ANIMAL QUARTERS AND MILK ROOMS

For rapid control of **House Flies, Mosquitoes, Gnats, Wasps, Hornets, Bees and Small-Flying Moths:** Close windows and doors and spray at the rate of 2 seconds per 1000 cubic feet of space. For best results, keep area closed for 10 minutes after spraying. Do not remain in treated area and ventilate after treatment is completed. Repeat treatment as needed, but not more often than once every 14 days.

TO TREAT LIVESTOCK: To protect beef cattle, dairy cattle, goats, sheep, hogs and horses from attacks of **Stable Flies, Horse Flies, Deer Flies, Face Flies, House Flies, Horn Flies, Mosquitoes, and Gnats:** Spray about 3 seconds on each side being careful to spray back, withers and forelegs thoroughly. To protect from **Face Flies,** spray the face and head, but do not spray into eyes. Repeat treatment as needed, but not more often than once every 14 days.

FOR SWINE: Do not ship animals 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.

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.

OUTDOORS

Point spray nozzle away from face. Hold can on slight downward angle. For best results, spray when air is calm. Allow a few minutes for product to take effect. Spray with wind if breeze is blowing.

FLYING INSECTS

Flies, Mosquitoes, Gnats, Small Flying Moths, Hornets and Yellow Jackets. Allow fog to drift over area. Direct spray toward bushes, or grass from at least 4 to 6 feet away. Give special attention to breeding areas such as garbage cans and compost piles. Repeat as necessary.

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.

CRAWLING INSECTS

Ants, Cockroaches, including Asian Cockroaches, Crickets, Mole Crickets, Centipedes, and Silverfish: Spray infested surface of patio or picnic area, hitting as many insects as possible. Also spray legs of tables and chairs to repel ants. Spray ant hills for best control.

STORAGE AND DISPOSAL

STORAGE: Store in a cool, dry area. Do not transport 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.

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

In case of emergency or for product use information please call 901/362-1950 Monday thru Friday 7:30 a.m - 4:30 p.m CST (Distributor hours, days of operation, and phone numbers will vary).

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

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