



11715-261

05/14/2003

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

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

AUG 14 2003

Subject: Amendment - Revised First Aid and Disposal Statements
Speer Py-Perm Aqueous Insect Killer #9
EPA Registration No. 11715-261
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 of food and feedstuffs" as well as "Remove pets, birds...are dry" to the "Directions for Use" section of your label.
2. Either delete the phrases "Repeat as necessary...or as needed...Repeat treatment as infestations occur... and Repeat treatment as necessary" or indicate a time period for retreatment based upon the residual efficacy of your product.
3. 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.
4. Delete the phrase "No Unpleasant Odor." This is a subjective statement based on the sensitivity of the user.
5. Add the following statement to the end of the tick and flea section: "Also, treat yard with a product registered for yard application."
6. Move the paragraph about sensitivity to pets to the directions for use on dogs.

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 #9

- Contains Pyrenone® and Permanone®
- Seeks out bugs where they hide
- Controls residential and garden insects
- For Household Residential Use Only
- 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
- Water-based formula
- 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 • No unpleasant odor

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

NET CONTENTS: _____

EPA REG. NO. 11715-261
 EPA EST. NO. 11715-TN-1

**READ ENTIRE LABEL BEFORE EACH USE
(For Animal Use)
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.

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.

Remove pets, birds and cover or 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.**

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

with COMMENTS
in EPA Letter Dated

AUG 14 2003

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

11715-261

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.

DIRECTIONS FOR USE

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

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.

SHAKE WELL BEFORE USING

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.

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.

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 erred 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. Consult a veterinarian before using this product on debilitated, aged, pregnant or nursing animals, or animals on medication. Do not use on puppies under twelve weeks old. **NOTE: 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.

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 towards 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, 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.

FOR THE CONTROL OF GARDEN INSECTS

For use on roses, dahlias, asters and other ornamentals to kill **Japanese Beetles** hit by spray, as well as **Whiteflies, Aphids, exposed Thrips, Spiders, Red Mites, and Leafminers.**

May be used on plants, as well as a multi-purpose spray in small gardens and for spot treatments of

incipient insect infestations to prevent spreading to large garden areas.

May also be used on other plants such as African violets, asters, azaleas, begonias, camellias, carnations, chrysanthemums, dahlias, delphiniums, dogwood, English ivy, euonymus, fuschia, geraniums, crassula, grape vine, Kentia palm, laurel, marigolds, rhododendrons, roses, rubber plants, snapdragons, stocks, wandering Jews, and zinnias.

Effective when used as directed against **Whiteflies, Aphids, Spider and Red Mites, exposed Thrips, Lace Bugs, Japanese Beetles, Pavement Ants, Clover Mites, and Army Worms.** When spraying plants, do not operate closer than 18 inches. Use sweeping motion. Spray in one second bursts. Be cautious about witing tender foliage, young plants and new growth. Do not spray plants when temperatures exceed 90° F. Contact insects directly whenever possible. Repeat treatment as infestations occur.

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.

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

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

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

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