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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

SEP 10 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 Total Release Fogger
EPA Registration No. 11715-262
Your Submission Dated April 22, 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 "Remove pets, birds...before spraying" to the "Directions for Use" section of your label.
2. Either delete the phrase "or when necessary" from the statement "Repeat spraying in two weeks or when necessary" or indicate a time period for retreatment based upon the residual efficacy of your product.
3. Delete the phrase "No Unpleasant Odor." This is a subjective statement based on the sensitivity of the user.
4. Add the following statement to the "Directions for Use" section of the label: "Do not allow children or pets to contact treated area until surfaces are dry."
5. Under Directions for Use add the qualifying phrase "In the home . . ." to the beginning of the statement, "All food processing surfaces and utensils . . . etc."
6. Replace "USDA" with "federally inspected" i.e., "Not for use in Federally inspected meat and poultry plants."

7. Due to the large amount of solvent in this product add "Contains petroleum distillates" beneath the ingredient statement and under Note to Physician in the First Aid section. Also add the following first aid statement: "If swallowed: immediately call a poison control center or doctor. Do not induce vomiting unless told 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."

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 TOTAL RELEASE INDOOR FOGGER

- Contains Pyrethron[®] and Permethrin[®]
- Seeks out bugs where they hide
- Kills on contact
- Non-staining
- No unpleasant odor
- Water-based formula
- Kills exposed or accessible stages of these insects: ants, booklice, carpet beetles, centipedes, cockroaches, confused flour beetles, crickets, earwigs, firebrats, fleas (adults and larvae), flies, fruit flies, gnats, grasshoppers, hornets, house flies, midges, millipedes, mole crickets, mosquitoes, palmetto bugs, pillbugs, rice weevils, sawtoothed grain beetles, scorpions, silverfish, small flying moths, sowbugs, spiders, stable flies (dog flies), ticks, wasps, waterbugs and yellow jackets.

ACTIVE INGREDIENTS:

Pyrethrins.....0.15%
 *Piperonyl Butoxide, Technical.....0.75%
 **Permethrin.....0.30%

INERT INGREDIENTS:.....98.80%
 100.00%

*Equivalent to min. 0.6% (butylcarbityl)(6-propylpiperonyl)ether and 0.15% related compounds.
 **(3-phenoxyphenyl) methyl (+/-) cis/trans 3-(2,2-dichloroethenyl) 2,2-dimethylcyclopropanecarboxylate.
 Cis/trans ratio: min. 35% (+/-) cis and max. 65% (+/-) trans.
 Pyrethron[®] and Permethrin[®] - Registered Trademark of Agrevo Environmental Health.

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

See Side Panel For Additional
Precautionary Statements

NET WEIGHT: _____

ACCEPTED
with COMMENTS
in EPA Letter Dated

EPA REG. NO. 11715-262
 EPA EST. NO. 11715-TN-1

SEP 10 2003

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

11715-262

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS & DOMESTIC ANIMALS CAUTION

Harmful if inhaled. Avoid breathing vapor or spray mist. Remove contaminated clothing and wash before reuse. Remove pets, birds and cover or remove fish bowls and aquariums before spraying.

IF INHALED:	<p style="text-align: center;">FIRST AID</p> <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.
<p>HOT LINE NUMBER</p> <p>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.</p>	

ENVIRONMENTAL HAZARDS

This product is toxic to fish and other aquatic organisms. Do not apply to water. Do not contaminate water by disposal of waste.

PHYSICAL OR CHEMICAL HAZARDS



Highly Flammable Ingredient
 Ingrediente Altamente Inflamable

This product contains a highly flammable ingredient. It may cause a fire or explosion if not used properly. Follow the "Directions For Use" on this label very carefully. Contents under pressure. Do not use or store near heat or open flame. Do not puncture or incinerate container. Do not place on stove or radiator. Exposure to temperatures above 130° F may cause bursting.

IMPORTANT! To avoid **FLAMMABILITY HAZARD**, use can as follows:

- ± Do not use more than one fogger per room.
- ± Do not place in cabinet or under counter or table
- + Shut off electrical equipment and pilot lights

DIRECTIONS FOR USE

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

DO NOT use more than one fogger per room. DO NOT use in small, enclosed spaces such as closets, cabinets or under counters or tables. Do not use in a room 5 ft. by

5 ft. or smaller; instead, allow fog to enter from other rooms. **Turn off ALL ignition sources such as pilot lights (shut off gas valves), other open flames or running electrical appliances that cycle off and on (i.e., refrigerators, thermostats, etc.).** Call your gas utility or management company if you need assistance with your pilot lights.

For use in apartments, attics, basements, boats, cabins, campers, closed barns, day camps, garages, homes, horse stables, household storage areas, kennels, pet sleeping areas, rooms, greenhouses (non commercial), ship cabins, bathhouses, seedhouses, washrooms, and the non-food/feed areas of schools, theaters, trucks, warehouses, box cars, hospitals, hotels, industrial plants, motels, and preschools.

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

Nonfood/feed areas in commercial establishments 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).

Not for use in USDA Meat and Poultry Plants.

One 6 ounce aerosol can treats up to 6,000 cubic feet of unobstructed area (a room 30' x 25' with an 8 foot ceiling).

HOW TO USE:

Step 1: PREPARATION

Open cupboards, cabinets, trunks, and doors to area to be treated to allow maximum kill in all areas where insects can hide and breed. Close outside doors and windows and shut off fans and air conditioning to maximize killing power of fog. Remove pets, birds, and tightly cover or remove fish bowls and aquariums before spraying. Cover waxed wood floors and waxed furniture in the immediate area surrounding the fogger (Newspapers may be used). Remove or cover exposed foods, dishes, utensils or food handling equipment. All food processing surfaces should be covered during treatment or thoroughly cleaned before using. Shut off electrical appliances. Do not place activated fogger in a cabinet or under a counter or table.

STEP 2: ACTIVATION OF FOGGER SHAKE WELL JUST BEFORE USING.

Place a section of newspaper on floor in center of room to be treated. NOTE: Do not place fogger on water-stainable surface. Tilt can opening away from face and depress tab firmly with thumb until it clicks in locked position. Aiming spray away from face, set fogger on newspaper, leave room and close door. After activation, leave room or house at once. Keep area closed for 2 hours (30 minutes for flying insects) before airing out. Open all doors and windows and allow to air for 30 minutes. Repeat spraying in two weeks or when necessary.

STORAGE AND DISPOSAL

STORAGE: Store in a cool, dry area inaccessible to children and pets and away from heat, sparks or open flame.

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.

Notice: Buyer assumes all responsibility for safety and use not in accordance with directions.

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

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