



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

February 19, 2004

Jean Butler
Speer Products
P.O. Box 18993
Memphis, TN 38181-0993

Subject: Label Amendment - Adding Advisory Statement
Speer Neoperm Wasp & Hornet Killer #1
EPA Reg. No. 11715-268
Your Submission Dated October 14, 2003

Dear Ms Butler:

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 listed 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. Add "Note to Physician: Contains petroleum distillate - vomiting may cause aspiration pneumonia." to the end of First Aid statement.
2. Revise the Precautionary Statements as follows:
 - a. Replace "Wash thoroughly with soap and water after handling." with "Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco."
3. Under the Ingredients Statement, replace "Inert Ingredients" with "Other Ingredients"

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4. Add "or served" to the statement "..... where food/feed is commercially prepared, processed or served".
 5. Change "USDA" to "federally inspected" meat or poultry plants.

Note, base on the acute toxicity of your product, you are not required to have an "If on skin or clothing" first aid statement. You may delete this statement if you wish. If you have any questions regarding this action, please contact BeWanda Alexander of my team at (703) 305-7460.

Sincerely,



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

SPEER NEOPERM WASP & HORNET KILLER #1

- *Contains Synergist Piperonyl Butoxide, Permethrin and Tetramethrin
- *Quick Kill
- *Kills Wasps, Hornets and Yellow Jackets
- *Jet Spray - Will reach nests up to 20 feet above ground
- *Kills Fast
- *Kills Wasps & Hornets on Contact
- *Kills with Residual Action as Wasp & Hornets Return to the nest
- * Kills the Entire Nest
- *Kills Wasps, Hornets & Yellow Jackets Instantly
- *Gives Knockdown & Kill of Wasps, Hornets & Yellow Jackets
- *Electrically Non-Conducting Dielectric Breakdown Voltage of 47,300 Volts
- *Can be used Indoors (attics and other places where nests are built) and Outdoors on Wasps & Hornet Nests

ACTIVE INGREDIENTS:

Tetramethrin*.....0.10%
 Permethrin**.....0.25%
 Piperonyl Butoxide,
 Technical***.....0.50%

INERT

INGREDIENTS†:.....99.15%
 TOTAL 100.00%

*1-cyclohexene-1,2-dicarboximidomethyl 2,2-dimethyl-3-(2-methylpropenyl) cyclopropanecarboxylate.
 **(3-phenoxyphenyl) methyl (+/-) cis/trans 3-(2,2-dichloroethenyl) 2,2-dimethylcyclopropanecarboxylate. Cis/trans ratio: min. 35% (+/-) cis and max. 65% (+/-) trans.
 ***Equivalent to min. 0.4% (butylcarbityl)(6-propylpiperonyl) ether and 0.1% related compounds.

†Contains Petroleum Distillates

**KEEP OUT OF REACH OF CHILDREN
 CAUTION**

See Side Panel For Use Precautions.

NET CONTENTS: _____

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS & DOMESTIC ANIMALS

CAUTION

Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Harmful if swallowed. Wash thoroughly with soap and water after handling. Prolonged or frequent repeated skin contact may cause allergic reactions in some individuals.

FIRST AID	
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.
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 SWALLOWED	<ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Do not give anything to the person. Do not induce vomiting unless told to do so by a poison control center or a doctor. Do not give anything by mouth to an unconscious person.
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	

ENVIRONMENTAL HAZARDS

This product is extremely toxic to fish and aquatic invertebrates. Do not apply directly to water.

PHYSICAL OR CHEMICAL HAZARDS

Contents under pressure. Do not use or store near heat or open flame. Do not puncture or incinerate container. Exposures to temperatures above 130° F may cause bursting.

EPA No. 11715-268 EPA Est. NO. 11715-TN-1

**ACCEPTED
 with COMMENTS
 In EPA Letter Dated
 FEB 19 2004**

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

11715-268

DIRECTIONS FOR USE

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

This product can be used both indoors (attics and other places where nests are built), and outdoors on wasp and hornet nests. Do not use in commercial food/feed handling establishments, restaurants or other areas where food/feed is commercially prepared or processed. Not for use in USDA Meat or Poultry Plants.

To operate, remove protective cap and depress button, being sure to aim spray opening at the location to be sprayed. Direct at wasps, hornets and yellow jackets whenever possible, and under eaves, into nests, cracks, holes or crevices wherever insects are noticed. Spray for about 1-2 seconds or until surface is moist from insecticide. To prevent entrance of insects into the house, spray around points where outside plumbing, faucets, etc. enter the house and into cracks or crevices in foundation as well as along sills and ledges. Do not use this product on or near asphalt shingles or vinyl siding due to the possibility of staining.

Kills Wasps, Hornets and Yellow Jackets: This spray is fast acting when insects are hit directly. With the breeze at your back, thoroughly spray the nest until it is soaked. Allow about 24 hours for those insects which were not directly hit by spray to leave the area. If insects should return to the treated area, spray again. This container delivers a stream type spray, making it possible for the operator to stay back from the places sprayed. This formula utilizes Synergist Piperonyl Butoxide, Permethrin and Tetramethrin, a combination specifically effective on this class of insects. It is preferable to apply this product in the

evening after all the insects have returned to the nest and are at rest.

STORAGE AND DISPOSAL

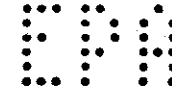
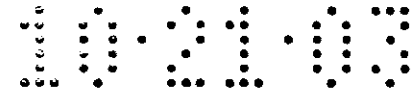
Do not contaminate water, food or feed by storage or disposal.

STORAGE: Do not store near heat or open flame. Store in cool, dry area away from children.

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.

**MANUFACTURED BY
SPEER PRODUCTS
P.O. BOX 18993
MEMPHIS, TN 38181-0993**

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



NTSVR\WORD\11715-268(amendment Asphalt Shingles 10/14/03jb)

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