

SEP 9 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 Neoperm Crawling Insect Killer I
EPA Registration No. 11715-271
Your Submission Dated April 24, 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, delete the statements "In case of contact...persists." Move the "Avoid contamination of food and feed" statement to the "Directions for Use" section of your label. Revise the "Wash thoroughly after handling" to read "Wash thoroughly with soap and water after handling."
2. Under the "Directions for Use" section, add the following statement: "Do not allow children and pets to enter until surfaces are dry." Also, add the phrase "...but not to the point of runoff" to the statement "Spray surface until slightly wet...".
3. Add the following statement to the end of the tick and flea section: "Also, treat yard with a product registered for yard application."
4. Either delete the phrase "Repeat as necessary" or indicate a time period for retreatment based upon the residual efficacy of your product.
5. Delete the phrase "No Unpleasant Odor." This is a subjective statement based on the sensitivity of the user.
6. Revise the last part of the paragraph to read "... where food is commercially prepared, processed or served."

7. Add the following precaution to the first paragraph under **Outdoors**: "Remove all exposed food and cooking utensils. Cover all food handling surfaces or wash thoroughly after treatment and before use. Do not use on edible crops."
8. Following the first sentence under "**Pests on Outside Surfaces of Building**" add "Hold can two (2) to three (3) feet from surface to be treated and spray to slightly moisten surface." Likewise revise the first sentence under **Crawling Insects** to read "Hold can two (2) to three (3) feet from surface to be treated and spray in infested surface of patio or picnic care, hitting as many insects as possible. Spray to slightly moisten the surface."

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

SEP 9 2003

NOTE TO PHYSICIAN

Contains petroleum distillate- vomiting may cause aspiration pneumonia.

**SPEER NEOPERM
CRAWLING INSECT KILLER I**

- For Household Use
- Contains Synergist Piperonyl Butoxide, Permethrin and Tetramethrin
- Provides Quick Killing Action and Residual Control
- Economical Do-It-Yourself Pest Control
- Use Indoors and Outdoors
- Kills Fleas - Roaches - Ants
- Kills on Contact - Kills Fast
- Kills Hidden Bugs
- Kills Bugs You See and Even the Ones You Don't See
- A broad spectrum insecticide highly effective against Ants, Bees, Carpenter Ants, Carpet Beetles, Centipedes, Cockroaches, Crickets, Earwigs, Firebrats, Fleas, Flour Beetles, Grain Beetles, Ground Beetles, Millipedes, Mole Crickets, Moths, Pillbugs, Scorpions, Silverfish, Sowbugs, Spiders, Ticks and many other crawling insects.
- No Oily Residue - No Unpleasant Odor
- Protects for up to 4 weeks

ACTIVE INGREDIENTS:

Tetramethrin*.....0.10%
Permethrin**.....0.25%
Piperonyl Butoxide, Technical***.....0.50%
INERT INGREDIENTS†:.....99.15%
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**

NET CONTENTS: _____

EPA Reg. No. 11715-271 EPA Est. No. 11715-TN-1

PRECAUTIONARY STATEMENTS

HAZARD TO HUMANS & DOMESTIC ANIMALS

CAUTION

Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. In case of contact, immediately flush eyes or skin with plenty of water. Get medical attention if irritation persists. Prolonged or frequent repeated skin contact may cause allergic reactions in some individuals. Wash thoroughly after handling. Remove and wash clothing before reuse. Avoid contamination of food and feed.

Fungicide, and Rodenticide Act
as amended for the pesticide
registered under EPA Reg. No.
11715-271

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. Keep away from heat, sparks, and 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.

Do not use in commercial food/feed handling establishments, restaurants, or other areas where food is commercially prepared or processed.

Remove protective cap, hold container upright and direct spray away from face. Hold can 12 - 15 inches from surface being sprayed. Press valve down and spray as directed. Spray surface until slightly wet (at a rate of 4 ounces product to treat approximately 25 square feet of surface area).

INDOORS:

Cockroaches (including adult and immature stages of both non-resistant and organophosphate and carbamate resistant strains), **Ants, Booklice, Boxelder Bugs, Centipedes, Crickets, Dermestids, Firebrats, Fleas, Palmetto Bugs, Silverfish, Sowbugs, Ticks and Waterbugs:** Apply thoroughly to all areas where these pests crawl and hide, especially in cracks and crevices, and hidden areas around sinks and storage areas, behind baseboards, around doors and windows, behind and under refrigerators, cabinets, sinks and stoves, the underside of shelves, drawers, bookcases, and in similar areas. When pests are driven out, spray directly. Repeat as necessary.

Ants: Spray freely around ant trails, doors and windows and other places where ants enter premises. Spray around nests hidden under steps, brickwork.

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"> • 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.
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.	

concrete, etc. Break apart accessible nests and spray freely on and around debris. Repeat as necessary.

Carpenter Ants: For effective control, locate and treat nests and surrounding areas. Apply around doors and windows and other places where ants enter premises and where they crawl and hide. Spray into infested wood through existing openings.

Brown Dog Ticks and Fleas in Buildings: Apply to infested areas such as pet beds and resting quarters, nearby cracks and crevices, under the edges of rugs and floor coverings, between and under cushions of upholstered furniture and other areas where these pests may be present. Old bedding of pets should be removed and replaced with clean fresh bedding after treatment of pet areas. **Do not use directly on pets.**

Spiders: Apply along and behind baseboards, to window and door frames, corners, pipes, storage localities, attics, crawl spaces and other areas over which these pests may crawl.

Centipedes, Earwigs, Ground Beetles, Millipedes, Mole Crickets, Pillbugs, Sowbugs, Scorpions and Ticks: 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.

Pantry Pests - Grain Beetles (Rusty, Merchant and Sawtoothed), Flour Beetles (Red and Confused), Chocolate Moths, Cigarette Beetles, Clover Mites, Cluster Flies, Drugstore Beetles, Elmleaf Beetles, Rice Weevils, Lesser Grain Borers, Spider Beetles and Tobacco Moths: Treat exposed stages. Remove all foodstuffs, utensils and shelf paper from area to be treated. Discard used shelf paper and any infested foodstuffs. Apply spray to shelves and in cracks and crevices behind and under cupboards and cabinets. Allow spray to dry prior to replacement of shelf paper, food and utensils.

Carpet Beetles (Black, Furniture and Varied): Spray on and under edges of floor coverings, under rugs and furniture and in closets or other localities where these insects are found.

Webbing Clothes Moths: Use this product as a crack and crevice treatment in closets and other storage areas where these pests are found. This is an adjunct treatment and will not control moth larvae already on clothes. Do not apply to clothing.

OUTDOORS:

Point spray nozzle away from face. Hold can on slight downward angle. For best results, spray when air is calm. Spray with wind if breeze is blowing.

PESTS ON OUTSIDE SURFACES OF BUILDINGS: For control of building infestation due to **Ants, Clover Mites, Crickets, Earwigs, Millipedes and Sowbugs (Pillbugs).** Spray foundation of building where insects are active and may find entrance up to a height of 2 to 3 feet. Apply as a residual spray to outside surfaces of buildings where insects tend to congregate. Spray areas include (but are not limited to) screens, window frames, eaves, porches, patios, garages and refuse dumps. Repeat treatment as necessary.

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.

Ants, Lone Star Ticks, Dog Ticks, Crickets, Fleas and Earwigs: Apply thoroughly to infestation in bushes, grass or weeds. For **Ants**, spray freely around ant trails and hills.

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.

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

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

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