



11715-273

09/10/2003

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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 Neoperm Crawling Insect Killer III
EPA Registration No. 11715-273
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. 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. Delete the phrase "No Unpleasant Odor." This is a subjective statement based on the sensitivity of the user.
4. 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...".
5. Either delete the phrase "Repeat as necessary" or indicate a time period for retreatment based upon the residual efficacy of your product.
6. Add the following statement to the end of the tick and flea section: "Also, treat yard with a product registered for yard application."

7. Add in parenthesis (cargo area only) following the site aircraft.
8. Change the word "service" to "serving" under Directions for Use.
9. The statement should read "Not for use in federally inspected meat and poultry plants."
10. Following the first sentence under "Pests on Outside Surfaces of Buildings" add "Hold can two (2) to three (3) feet from surface to be treated and spray to slightly moisten surface."
11. Add the following precaution to the end of the "Pests on Outside Surfaces of Buildings" "Before spraying 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."

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 NEOPERM CRAWLING INSECT KILLER III

- Recommended for Commercial/Industrial Use
- Contains Synergist Piperonyl Butoxide, Permethrin and Tetramethrin
- Provides Quick Killing Action and Residual 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* | 0.20% |
| Permethrin** | 0.50% |
| Piperonyl Butoxide, Technical*** | 1.00% |
| INERT INGREDIENTS†: | 98.30% |
| | 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 0.8% (butylcarbityl)(6-propylpiperonyl) ether and 0.2% related compounds.
 †Contains petroleum distillates.

KEEP OUT OF REACH OF CHILDREN
CAUTION

See Side Panel For Additional Precautions

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EPA Reg. No. 11715-273 EPA Est. No.
 Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 11715-273

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.

| 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. | |

NOTE TO PHYSICIAN
 Contains petroleum distillate- vomiting may cause aspiration pneumonia.

ENVIRONMENTAL HAZARDS

This product is extremely toxic to fish and aquatic invertebrates. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark.

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.

GENERAL INFORMATION: Speer Neoperm Crawling Insect Killer III provides effective control of pests in and on buildings and structures and their immediate surroundings and on modes of transport. Permitted areas of use include, but are not limited to: apartment buildings, homes, hospitals, hotels, industrial buildings, laboratories, mausoleums, motels, nursing homes, private residences, schools, stores, utilities warehouses, and in non-food areas of restaurants, food manufacturing, processing, and servicing establishments, and on: vessels, rail cars, aircraft, buses, trucks and trailers.

Do not use in commercial food/feed areas of food/feed handling establishments, restaurants or other areas where food/feed is commercially prepared or processed. Do not use in service areas while food is exposed or facility is in operation. Service areas are areas where prepared foods are served such as dining rooms, but excluding areas where foods may be prepared or held. Not for use in USDA meat and poultry plants. In the home, cover all food handling surfaces and cover or remove all food and cooking utensils, or wash thoroughly after treatment.

Do not apply this product in occupied patient rooms or in any room occupied by the elderly or infirm. Do not apply to classrooms when in use.

Hold container upright and direct spray away from you.

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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).

Cockroaches (including adult and immature stages of both non-resistant and organophosphate and carbamate resistant strains), **Ants, Booklice, Boxelder Bugs, Crickets, Dermestids, Firebrats, Fleas, Silverfish, Ticks and Sowbugs:** Apply as a spot or crack and crevice treatment. Apply thoroughly to all areas where these pests crawl and hide, especially in cracks and crevices, and hidden surfaces 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. 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, 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 or newly drilled small holes.

Brown Dog Ticks and Fleas in Buildings: Apply in 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 apply directly on animals.**

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.

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.

LOCALIZED TREATMENT OF WOOD-INFESTING INSECTS: Beetles and Borers (such as the following families: Anobilidae, Bostrichidae, Buprestidae, Cerambycidae, Lyctidae, Oedemeridae, Sesiidae), **Carpenter Bees, and Wood Wasps:** Locate area of infestation and/or insect tunnels and cavities. Using a crack & crevice tip, spray into tunnel gallery and inaccessible closed voids. In infested areas, small holes should be drilled eight to ten inches apart to insure thorough insecticide gallery treatment. Be sure not to contact electrical wiring or plumbing when treating. For Carpenter Bees, seal the entrance holes with small pieces of stainless steel wool after application.

FOOD HANDLING ESTABLISHMENTS - Places other than private residences in which food is held,

processed, prepared or served.

NON-FOOD AREAS: Speer NeoPerm Crawling Insect Killer III may be used as a crack and crevice treatment or as a spot application in non-food areas. All areas where insects hide or through which insects may enter should be treated.

Non-food areas are areas such as garbage rooms, lavatories, floor drains (to sewers), offices, locker rooms, machine rooms, boiler rooms, garages, mop closets and storage (after mopping or bottling).

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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