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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

MAR 16 2003

Ms. Jean Butler
Regulatory Affairs Assistant
Speer Products, Incorporated
4242 B. F. Goodrich Blvd
P.O. Box 18993
Memphis, TN 38118

Subject: Amendment - Revised Final Label
Speer Neoperm Total Release Indoor Fogger IV
EPA Registration No. 11715-278
Your Submission Dated September 6, 2002

Dear Ms. Speer:

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.

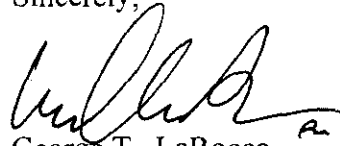
1. Delete the phrase "No Unpleasant odor" from your label. This is a subjective statement that is based on the sensitivity of the individual user.
2. Because your product contains petroleum distillate, add the following statements to your FIRST AID section:

"IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Do not give any liquid 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."
3. Revise your Precautionary Statements to read: "Harmful if swallowed, absorbed through the skin, or inhaled. Causes moderate eye irritation. Avoid breathing vapor or spray mist. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling."
4. Either delete the phrase "or when necessary" or indicate a time period based upon the residual efficacy of your product.

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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 TOTAL
RELEASE INDOOR FOGGER IV**

Contains Synergized Permethrin and Tetramethrin
Economic Do-It-Yourself Pest Control
Seeks Out Bugs Where They Hide
Kills on Contact Kills Hidden Bugs
For Use In Apartments, Attics, Basements, Boats,
Boxcars, Cabins, Campers, Garages, Homes,
Household Storage Areas, Kennels, Pet Sleeping
Areas, Rooms, Ship Cabins, Trucks, Washrooms and
Non-Food/Feed Areas of Closed Barns, Day Camps,
Horse Stables, Hospitals, Hotels, Industrial Plants,
Bathhouses, Motels, Preschools, Seedhouses,
Theaters and Warehouses
Non-Staining

No Oily Residue - No Unpleasant Odor
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,
Saw-Toothed Grain Beetles, Scorpions, Silverfish,
Small Flying Moths, Sowbugs, Spiders, Stable Flies,
Ticks, Wasps, Waterbugs and Yellow Jackets.

ACTIVE INGREDIENTS:

Tetramethrin*.....0.20%
Permethrin**.....0.50%
Piperonyl Butoxide,
Technical***.....1.00%

INERT

INGREDIENTS†:.....98.30%

*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-propyl) piperonyl ether and 0.2% related compounds.
†Contains petroleum distillates.

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

See Side Panel For Additional Precautions

ERA REG. NO. 11715-278

EPA EST. NO. 11715-TN-1

NET CONTENTS: _____

FIRST AID

<p>IF ON SKIN OR CLOTHING</p>	<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.
<p>IF IN EYES</p>	<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.
<p>IF INHALED</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.

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.

**PRECAUTIONARY STATEMENTS
HAZARD TO HUMANS & DOMESTIC ANIMALS**

CAUTION

Avoid contact with skin, eyes or clothing. In case of contact immediately flush eyes or skin with plenty of water. Get medical attention if irritation persists.

ACCEPTED
with COMMENTS
in EPA Letter dated

PHYSICAL OR CHEMICAL HAZARDS



MAR 16 2003

Under the Federal Insecticide, Fungicide, and Rodenticide Act
Highly Flammable Ingredient, and Rodenticide Act
Ingredient Altamente inflamable
registered under EPA Reg. No.

11715-278

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. 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.

**IMPORTANT! TO AVOID
FLAMMABILITY HAZARD, USE CAN AS
FOLLOWS:**

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. x 5 ft. or smaller; instead, allow fog to enter from other rooms. Turn off ALL ignition sources such as pilot lights (shut off gas valve), 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.

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).

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For **Fleas and Ticks**, use one 6 ounce can for every 6,000 cubic feet of room space.

Not for use in Federally Inspected Meat and Poultry Plants.

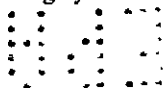
Do not use in food/feed areas of food/feed handling establishments, restaurants or other areas where food/feed is commercially prepared or processed. Do not use in serving areas while food is exposed or facility is in operation. Serving areas are areas where prepared foods are served such as dining rooms, but excluding areas where foods may be prepared or held. In the home all food processing surfaces and utensils should be covered during treatment or thoroughly washed before use.

For use in non-food 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).

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.



Step 2: ACTIVATION

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

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 directions given herewith.

**MANUFACTURED BY:
SPEER PRODUCTS, INC.
P. O. Box 18993
MEMPHIS, TN 38181-0993**

NTSVR:WORD\11715-278amend(09-06-02jb)