B/14/2003

11715-316

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 Flying/Crawling Insect Killer EPA Registration No. 11715-316 Your Submission Dated May 5, 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 "Avoid contamination. . . . surfaces are dry" to the "Directions for Use" section of your label.
- 2. Either delete the phrases "Repeat as necessary" and "Repeat treatment as necessary" and "Repeat treatment as infestations occur" or indicate a time period for retreatment based upon the residual efficacy of your product.

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 yours,

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

Enclosure

SPEER NEOPERM FLYING/CRAWLING INSECT KILLER

Controls Residential and Ornamental Garden Insects

A Broad Spectrum Insecticide Highly Effective Against :

Ants, Carpenter Ants, Bees, Carpet Beetles, Centipedes, Clover Mites, Cockroaches, Crickets, Deer Ticks, Earwigs, Firebrats, Fleas, Ground Beetles, Millipedes, Mole Crickets, Moths, Pillbugs, Scorpions, Silverfish, Sowbugs, Spiders, Ticks, Wasps

For Use In and Around the Home ONLY

ACTIVE INGREDIENTS:

Tetramethrin*	0.20%
Permethrin**	0.20%
Piperonyl Butoxide, Technical***	1.00%
INERT INGREDIENTS†:	98.60%
	100.00%

*1-cyclobexene-1,2-dicarboximidomethyl 2,2-dimethyl-3-(2-

methylpropenyl)cyclopropanecarboxylate.

**(3-phenoxyphenyl) methyl (+/-) cis/trans 3-(2,2-dichloroethenyl) 2.2dimethylcyclopropanecarboxylate. Cis/trans ratio: min. 35% (+/-) cis and max. 65% (+/-) trans.

***Equivalent to min 0.1% (butylcarbityl)(6-propylpiperonyl) ether and 0.25% related compounds.

+Contains petroleum distillates.

KEEP OUT OF REACH OF CHILDREN

CAUTION

See Side Panel For Additional Precautions

NET CONTENTS:

EPA REG. NO. 11715-316 EPA EST. NO. 11715-TN-1

PRECAUTIONARY STATEMENTS HAZARD TO HUMANS & DOMESTIC ANIMALS CAUTION

Harmful if absorbed through skin or inhaled. Avoid contact with skin, eyes or clothing. Avoid breathing vapor or spray mist. Remove contaminated clothing and wash before reuse. Wash thoroughly with soap and water after handling and before smoking or eating. Avoid contamination of feed and food stuffs. Remove pets and birds and cover fish aquaria before space spraying or surface applications. Vacate room after treatment and before re-occupying. Do not allow children or pets to contact treated areas until surfaces are dry.

	FIRST AID	
IF ON SKIN OR CLOTHING:	Take off contaminated clothing.	
	 Rinse skin immediately with plenty of water for 15-20 minutes. 	
· <u> </u>	Call a poison control center or doctor for treatment advice.	
IF INHALED:	 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 posisble. Call a poison control center or doctor for further treatment advice. 	
IF IN EYES:	 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. 	
UCEPTED	Call a poison control center or doctor for treatment advice.	

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Under the Federal Insecticide, Pungicide, and Rodenticide Act as maended, for the policide registered under TCA Reg. No.

715.316

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 personl. Do not give anything by mouth to an unconscious person.
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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 toxic to fish. Do not apply directly to any body of water. Do not contaminate water when disposing of equipment washwaters.

PHYSICAL OR CHEMICAL HAZARDS

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. Do not apply this product in conduits, motor housings, junction and switch boxes or other electrical equipment because of possible shock hazard. Do not use on surfaces that can be harmed or stained by water.

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.

SHAKE WELL JUST BEFORE USING.

Remove protective cap, hold container upright and spray from a distance of 12 to 15 inches. Remove birds and cover fish aquariums before spraying.

INDOORS:

Houseflies, Fruit Flies, Mosquitoes, Gnats, Wasps, Hornets, Bees, Black Flies, Skipper Flies, Blow Flies and Small Flying Moths: Close all doors and windows and direct spray upward into center of room with a slow sweeping motion. Spray 5-10 seconds for average room. Direct spray to all parts of the room, especially windows and other light sources which attract these insects. Keep nozzle in constant motion. Leave room and keep area closed for 15 minutes after spraying. Ventilate room thoroughly before re-entry. Sweep up and discard fallen insects. Repeat treatment as necessary.

Cockroaches, Waterbugs, Palmetto Bugs, Silverfish, Firebrats, Crickets, Scorpions, Spiders, Millipedes, Centipedes, Sowbugs and Pillbugs: Spray into hiding places such as cracks and crevices, behind sinks, cabinets, along baseboards and floors, around drains and plumbing, hitting insects with spray whenever possible. Repeat treatment as necessary.

Ants: Spray trails, nests and points of entry. Spray on ants where possible. Repeat as necessary.

Carpet Beetles: Spray directly on beetles, floors, baseboards, shelves and carpets. Repeat treatment as necessary.

Bedbugs: Spray mattresses, particularly around tuffs and seams. Take beds apart and spray into all joints. Treat baseboards, moldings and floors. Repeat treatment as necessary.

TO CONTROL Clothes Moths and Carpet Beetles on wool and other proteinaceous fibers: Remove infested articles from storage, brush thoroughly, and air for several hours in sunlight, if possible. Apply spray liberally to empty chests. closets, bureaus and other storages directing the spray into cracks, joints and crevices. After airing, infested articles may be treated by spraying lightly, keeping nozzle at least three feet from fabric to avoid staining.

OUTDOORS:

Point spray nozzle away from face. Hold can on slight downward angle. For best results, spray when air is calm. Allow a few minutes for product to take effect. Spray with wind if breeze is blowing. **PESTS OUTSIDE SURFACE 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.

FLYING INSECTS: Flies, Mosquitoes, Gnats, Small Flying Moths, Hornets, and Yellow Jackets: Allow fog to drift over area. Direct spray toward bushes, or grass from at least 4 to 6 feet away. Give special attention to breeding areas such as garbage cans and compost piles. Repeat 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, Crickets, Fleas, Ticks (Including Deer Ticks), and Earwigs: Apply thoroughly to infestation in bushes, grass or weeds. For Ants, spray freely around ant trails and hills.

FOR THE CONTROL OF ORNAMENTAL GARDEN INSECTS: For use on roses, dahlas, asters and other ornamentals to kill Japanese Beetles hit by spray, as well as Whiteflies, Aphids, exposed Thrips, Spiders, Red Mites and Leafminers.

May also be used on other plants such as African violets, asters, azaleas, begonias, camellias, carnations, chrysanthemums, dahlias, delphiniums, dogwood, English ivy, euonymus, fuschia, geraniums, crassula, grape vine, Kentia palm, laurel, marigolds, rhododendrons, roses, rubber plants, snapdragons, stocks, wandering Jews and zinnias.

Effective when used as directed against Whiteflies, Aphids, Spider and Red Mites, exposed Thrips, Lace Bugs, Japanese Beetles. Pavement Ants, Clover Mites and Army Worms. When spraying plants do not operate closer than 18 inches. Use sweeping motion. Spray in one second bursts. Be cartious about wetting tender foliage, young plants and new growth. Do not spray plants when temperatures exceed 90°F. Contact insects directly whenever possible. Repeat treatment as infestations occur.

STORAGE AND DISPOSAL STORAGE: Store in cool dry area. 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. 4242 B. F. GOODRICH BLVD. MEMPHIS, TN 38118

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