



11715-318

06/25/2003

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

JUN 25 2003

Mr. William L. Washburn
Speer Products, Inc.
4242 B.F. Goodrich Blvd.
Memphis, TN 38118

Subject: Label Amendment Updating First Aid and Disposal Statements in
Accordance with PR Notices 2001-1 and 2001-6
Speer Dry Insecticide
EPA Reg. No.: 11715-318
Your Submission Dated May 5, 2003

Dear Mr. Washburn:

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 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. Delete the following statements from the Hazards to Humans and Domestic Animals section. The complete and appropriate first aid measures are correctly located in the First Aid section:

"In case of contact, flush with plenty of water."
"Obtain medical attention if irritation persists."

2. Move the following statements from the Hazards to Humans and Domestic Animals section to the Directions for Use on dogs and cats:

"Sensitivities may occur after using ANY pesticide product for pets. If signs of sensitivity occur, bathe your pet with mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately."

3. In the list of use sites on page 2, add "(cargo areas only)" after "Airplanes".

4. Revise the beginning of the "Non-Food Areas" section on page 2 to read "Non food/feed areas of food/feed handling establishments are areas such as ..."

5. In the second paragraph of the right-hand column on page 2 (Crack and Crevice directions), change "expansive joints" to "expansion joints".

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If you have any questions regarding this action, please contact Susan Stanton of my team at (703) 305-5218.

Sincerely,

A handwritten signature in black ink, appearing to read "Susan L. Stanton, for". The signature is fluid and cursive, with a large initial 'S' and a distinct 'for' at the end.

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

Enclosure

SPEER DRY INSECTICIDE

[] or () indicates alternate or optional wording

[Speer Dry Insecticide][brand name] provides quick [fast][rapid] control

[Speer Dry Insecticide][brand name] kills [controls][keeps on working for] up to 6 months when undisturbed

[Speer Dry Insecticide][brand name] can be used in homes, institutions, food/feed plants and many other areas

Contains the botanical insecticide Pyrethrum [an extract of a Chrysanthemum flower]

Kills [controls] and Repels ants, cockroaches, silverfish, fleas and other listed insects

ACTIVE INGREDIENTS:

Pyrethrins.....1.00%

Piperonyl butoxide, Technical*.....10.00%

Silicon Dioxide.....60.00%

INERT INGREDIENTS:.....29.00%

100.00%

*Equivalent to 8.00% (butylcarbityl)(6-propylpiperonyl) ether and 2.00% related compounds.

KEEP OUT OF REACH OF CHILDREN

CAUTION

NET CONTENTS: _____

**ACCEPTED
with COMMENTS**

EPA REG. NO. 11715-318 **In EPA Letter Dated:**
EPA EST. NO. 11715-TN-1

JUN 25 2003

Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
11715-318

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS CAUTION

Harmful if swallowed. Avoid inhalation of dust. Avoid contact with skin or eyes. In case of contact, flush with plenty of water. Wash with soap and water after use. Obtain medical attention if irritation persists. Avoid contamination of food and feedstuffs. Sensitivities may occur after using ANY pesticide product for pets. If signs of sensitivity occur bathe your pet with mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately.

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

- 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.

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

Do not contaminate water when disposing of equipment washwaters.

PHYSICAL OR CHEMICAL HAZARDS

Do not use or store near heat or open flame.

[Speer Dry Insecticide][brand name] contains the quick killing botanical insecticide, Pyrethrum, [an extract of a Chrysanthemum flower,] which provides effective control on insects upon direct contact with an added benefit of flushing [repelling] these insects to aid in a more complete control [kill].

The silicon dioxide, in [Speer Dry Insecticide][brand name] provides long term [residual] control through a desiccating action [drying action] [abrasive action]. Put the powder down and insects walking on it will continue to die for up to 6 months.

[Speer Dry Insecticide][brand name] provides fast, effective control [kill] and repellency of cockroaches, ants, pharaoh ants, foraging drywood termites and other listed insects.

[Speer Dry Insecticide][brand name] can be used in the home and other listed areas to control [kill], on contact, listed crawling pests. Effectively controls [kills] exposed stages of stored product pests.

[Speer Dry Insecticide][brand name] provides quick kill [control] with Pyrethrins and long term [residual] control with silicon dioxide.

Kills [controls] insects on contact [such as]:

Cockroaches, Smoky Brown Cockroach, Brown Banded Cockroach, Asian Cockroach, German Cockroach ,

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American Cockroach, Australian Cockroach, Oriental Cockroach, Crickets, Waterbugs, Palmetto Bugs, Granary Insects, Flat Grain Beetles, Cadelles, Cigarette Beetle, Lesser Grain Borer, Dark Mealworm, Rice Weevils, Ants, Spiders, Scorpions, Lice, Silverfish, Firebrat, Bedbugs, Earwigs, Sowbugs, Pillbugs, Millipedes, Beetles, Dermestids [Carpet Beetles], Stored Product Pests, Weevils, Flour Beetle, Drugstore Beetle, Merchant Grain Beetle, Yellow Mealworm, Carpenter Ants [Eastern (Western)], Dust Mites, Pharaoh Ants, Foraging Drywood Termites, Fleas, Brown Dog Tick, American Dog Tick, Centipedes, Mites, Lone Star Tick, Gulf Coast Tick, Booklice, Boxelder Bugs, Sawtoothed Grain Beetle, Grain Weevil, Warehouse Beetle, Red Flour Beetle, Confused Flour Beetle, Cheese Mites, Grain Mites, Flour Beetle, Bees, Carpenter Bees, Wasps, Yellow Jackets, Hornets.

For use in [including, but not limited to][such as]: Airplanes, Animal Quarters, Ant Hills, Apartments, Attics, Automobiles, Bakeries, Barns, Basements, Bathrooms, Bedding, Bedrooms, Beverage Plants, Boats, Bookcases, Bottling Plants, Buildings Housing Animals or Poultry, Buses, Cabins, Cafeterias, Calving Barns, Campers, Camp Sites, Canneries, Cat Sleeping Quarters, Chests, Clothes Storage, Closets, Closed Porches, Commercial Buildings, Condominiums, Crematoriums, Cupboards, Dairy Barns, Dairies, Day Care Centers, Dens, Dog Houses, Dog Sleeping Quarters, Dormitories, Dried Fruit Storage Areas, Drive-Ins, Drugstores, Dumpsters, Fabric Storage Areas, Factories, Farm Structures, Food/Feed Plants, Food/Feed Storage Areas, Funeral Parlors, Garages, Garbage Cans, Gazebos, Goat Holding Areas, Grain Elevators, Grain Storage, Greenhouses non-plant use, Homes, Horse Stables, Hog Barns, Hospitals (non-occupied patient areas), Hotels, Houses, Industrial Plants, Indoor Eating Establishments, Institutions, Jails, Kennels, Kitchens, Lanais, Livestock Holding Areas, Living Rooms, Loafing Sheds, Locker Rooms, Manholes, Mattresses, Mausoleums, Mess Halls, Milk Houses, Milk Rooms, Milk Sheds, Milking Rooms, Mobile Canteens, Mobile Homes, Morgues, Mortuaries, Motels, Nursing Homes, Office Buildings, Other Public Buildings, Outdoor Eating Establishments, Patios, Pet Bedding, Pet Grooming Parlors, Pet Sleeping Areas, Pet Stores, Pet Carriers, Play Houses, Play Rooms,

Porches, Poultry Houses, Prisons, Quonset Huts, Railroad Cars, Recreation Vehicles, Recreational Areas, Restaurants, Rice Mills, Rooms, Schools, Seed Storage, Sewers, Sheep Holding Areas, Shelf Areas, Ships, Solarium, Sports Stadiums, Stables, Storage Areas [Sites], Stored Product Areas, Sunrooms, Supermarkets, Swine Houses, Taverns, Tents, Theaters, Tobacco Warehouses, Trailers, Trains, Transportation Vehicles, Tree Houses, Tree Nuts Storage Areas, Trucks, Utility Conjunction Boxes, Utility Conjunction Pedestals, Utility Rooms, Verandahs, Veterinaries, Warehouses, Washrooms, Wheat Mills and Zoos.

DIRECTIONS FOR USE

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

READ ALL DIRECTIONS COMPLETELY BEFORE USE.

Do not apply this product in hospital patient rooms while occupied or in any rooms while occupied by the elderly or infirm. Do not apply to classrooms when in use. Do not apply to institutions (including libraries, sports facilities, etc.) in the immediate areas when occupants are present.

FOR MOST EFFECTIVE RESULTS, FOLLOW DIRECTIONS FOR SPECIFIC USE AREAS.

APPLICATIONS WITHIN FOOD AREAS:

APPLICATIONS OF THIS PRODUCT IN THE FOOD AREAS OF FOOD HANDLING ESTABLISHMENTS, OTHER THAN AS A CRACK AND CREVICE TREATMENT, ARE NOT PERMITTED.

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 food may be prepared or held.

In the home, cover all food handling surfaces and cover or remove all food and cooking utensils or wash thoroughly after treatment.

LIMIT TO CRACK AND CREVICE TREATMENT ONLY.

Food processing plants and warehouses, bakeries, beverage and bottling plants, restaurants, schools, kitchens, supermarkets, meat and poultry processing plants, hotels, motels, hospitals, milking areas, meat, poultry and other livestock areas.

Using a bulbous, mechanical or other electric duster apply a small amount of material directly into cracks and crevices such as expansive joints between different elements of construction or between equipment bases and the floor, wall voids, motor housing, junction boxes or switch boxes, conduits or hollow equipment legs where listed insects hide. Care should be taken to avoid depositing the product onto exposed surfaces or introducing the material into the air. Avoid contamination of food or food processing surfaces.

NON-FOOD AREAS:

Non food/feed areas of food/feed areas are 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 and bottling).

Cockroaches [Smoky Brown Cockroach, Brown Banded Cockroach, Asian Cockroach, German Cockroach, American Cockroach, Australian Cockroach, Oriental Cockroach], Waterbugs, Palmetto Bugs, Crickets, Firebrat, Silverfish, Booklice, Scorpions, Spiders, Centipedes, Sowbugs, Pillbugs, Earwigs, Clover Mites, Lice and Millipedes: Distribute [Speer Dry Insecticide][brand name] at the rate of 1.5 ounces per 100 square feet of surface area. Apply a continuous visible film to hiding places such as crack and crevices, behind and beneath sinks, stoves, refrigerators, around garbage cans, cabinets, along baseboards, door sills, frames and floors, around drains, pipes, plumbing, behind bookcases, storage and other utility installation. For severe infestations apply behind cabinets and walls, in crawl spaces and attics at a rate of 12 ounces per 1000 square feet. Repeat as necessary.

FOR USE ON STORED PRODUCTS:

EXPOSED STAGES of Flour Beetles, Cadelles, Rice Weevils, Flat Grain Beetles, Cigarette Beetles, Confused Flour Beetles, Drugstore Beetles, Lesser Grain Borer, Merchant Grain Beetle, Rice Weevil,

Sawtoothed Grain Beetle, Grain Weevils, Warehouse Beetle, Red Flour Beetle, Grain Mites, Cheese Mites, Flour Beetles, Granary Insects and Mealworms. Find and destroy infested package goods [sacks (boxes) (cartons) (containers)]. Remove all other items from pantry, shelves and drawers. Thoroughly treat floors, walls and other surfaces in bins, storage and handling areas, shelves, drawers, cabinets, processing and handling equipment, around cartons or containers and other areas where these insects tend to congregate. Repeat as necessary.

FOR USE IN STORAGE SITES: This product can be used in warehouse bins and trucks, cargo ships, mills, bin hoppers, elevators and conveying equipment and other listed sites as a clean up prior to using them for storage. In mills and elevators, all grain infested accumulations should be removed from the bin hoppers. All storage and conveying equipment should be thoroughly cleaned by sweeping out the waste grain, cobwebs and other debris from the walls and rafters as well as on the floor and door frames with special attention to material lodged in the cracks and crevices. All of the debris should be removed and disposed of in outside trash. Repeat as necessary.

FOR FARMS, particular attention should be given to cleaning up around the used feed and grain bags, grain residues from wagons, harvesting equipment and feed troughs. Newly harvested grain should not be placed in the same bin with carry-over grain and all carry-over grain stocks that are not treated with grain protectant should be fumigated. These cleaning operations should be done within two or three weeks before harvest.

After above sanitation measures have been employed, dust all areas prior to use for storage. Apply dust to floors, ceilings and partition boards of bins, paying particular attention to cracks and crevices. Repeat as necessary.

ANTS, Pharaoh Ants, Carpenter Ants: Treat doors, around window frames, ant trails and hills, cracks and crevices and other areas of entry. Repeat as necessary.

BEDBUGS: Take bed apart. Dust into joints and channels. If hollow, such as square or round tubing, see that the interior of framework is well dusted. Mattresses should be dusted, especially tufts, folds and edges. Picture frame molding and all crack and

crevices in the room should be treated. Repeat as necessary.

FOR USE IN LISTED PET AREAS: Remove and destroy or wash pet's old bedding. To reduce infestation, dust animal's bedding, sleeping quarters, kennel, around baseboards, window and door frames, wall cracks, floors, carpeting and other resting places. Also dust the entire inside surface of dog houses. Put fresh bedding in pet's quarters. Repeat as necessary.

For best results, to protect your pet against and to minimize reintroduction of adult fleas from outdoors, use EPA registered flea and tick products, ([such as][brand name] flea or flea and tick collar, [brand name] pet powder, [brand name] pet spray, [brand name] pet dip, [brand name] pet shampoo, flea shampoo or flea and tick shampoo), in conjunction with this application and prior to re-entry. Repeat as necessary.

LICE, FLEAS AND TICKS ON DOGS AND CATS ONLY: Liberally apply powder to the animal, rubbing thoroughly to the skin. Begin with the neck and include the underbody, legs, feet and the base of the tail. Some temporary drying of the animal's skin may occur. Do not repeat treatment for one week. Do not use on kittens and puppies less than 12 weeks old. Consult a veterinarian before using this product on debilitated, aged, medicated, pregnant or nursing animals.

FOR USE IN UNOCCUPIED ANIMAL QUARTERS, Barns, Dairies, Milking Parlors, Milking Rooms, Poultry Houses and other listed animal areas: Use in cracks, crevices, walls, joints between stalls, floors and other areas where pests may hide. Avoid contamination of feed, feedstuffs, milking equipment. Repeat as necessary.

DRYWOOD TERMITES: To protect against entrance, using an electric or hand operated rotary duster, distribute [Speer Dry Insecticide][brand name] through an entry, crawl hole into attic and crawl space of building, at a rate of 12 ounces per 1000 square feet. All vents and blowers on the windward side should be closed. Contact all wood surfaces. In case of localized infestations, probe to locate galleries and drill holes to inject [Speer Dry Insecticide][brand name] into the galleries. If a reasonably heavy infestation is suspected, professional treatment should be employed. Repeat as necessary.

BEEES, HORNETS, YELLOW JACKETS AND WASPS: It is generally advisable to treat nests in the evening when insects are less active and have returned to the nest. Using hand or power duster or other suitable means, with extension tubes, if necessary, thoroughly dust nests and entrance and surrounding areas where insects alight. Nests in wall voids can be located by listening with your ear against the wall. To treat, drill a hole in the area. For best results check nests carefully one to two days after treatment to ensure complete kill. Then remove and destroy nest to prevent emergence of newly hatched insects. If removal is not feasible, retreat the nest, if necessary. Do not use this product to treat overhead nests. Repeat as necessary.

SEWER TREATMENTS: Cockroach infestations in sanitary sewers may be treated with approximately 4.5 ounces of [Speer Dry Insecticide][brand name] per manhole. When treating sewers, one manhole per 200 feet of line should be treated. Treatments are made by removing the manhole cover and replacing with a disc of plywood bored to receive the usual flexible hose from portable to truck mounted ventilating equipment. 4.5 ounces of [Speer Dry Insecticide][brand name] is introduced into the ventilating air to be dispersed quickly and thoroughly through the system. Repeat as necessary.

STORAGE AND DISPOSAL

STORAGE: Store in tightly closed container in a dry place.

DISPOSAL: If empty: Do not reuse this container. 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. Never place unused product down any indoor or outdoor drain.

For product use information please call 901/362-1950 Monday thru Friday 7:30 to 4:30 CST (Distributor phone numbers and hours of operation will vary)

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

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