08/20/2003

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF PREVENTION, PESTICIDES **AND TOXIC SUBSTANCES**

AUG 2 0 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 Statements

Speer Ant and Roach Killer II EPA Registration No. 11715-320 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 "Remove pets, birds, and cover...spray has dried" to the "Directions for Use" section of your label. Change the phrase "Causes eye irritation" to read "Causes moderate eye irritation."
- 2. Under the "Directions for Use" section of your label, please add the following statements to the first paragraph: "Do not apply this product in occupied patient rooms or in any rooms/areas while occupied by patients, the elderly or infirm. Do not apply in classrooms when in use. Do not apply to institutions (including libraries, sports facilities, etc.,) in the immediate area when occupants are present."
- 3. Either delete the phrases "Repeat as necessary" and "Repeat treatment as necessary" or indicate a time period for retreatment based upon the residual efficacy of your product.
- 4. Add the following statement to the end of the tick and flea section: "Also, treat yard with a product registered for yard application."

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 ANT AND ROACH KILLER II

Pressurized Spray - Effective for weeks against: Ants, Cockroaches, Fleas, Ticks and Other Listed Insects.

For Use in Homes and Non-Food Areas of Kennels, Commercial Buildings: Warehouses, Theatres, Office Buildings, Schools, Motels, Hotels, Restaurants, and Food Processing Facilities.

ACTIVE INGREDIENTS:

(RS)-2-Methyl-4-oxo-3-(2-propynyi) cyc	lopent-2-enyl
(1RS)-cis, trans-	
chrysanthemate	0.03%
(S)-Cyano (3-phenoxyphenyl) methyl-(S)-4-chloro-
alpha-(1-methylethyl)	
benzeneacetate	0.05%
N-Octyl bicycloheptene	
dicarboximide*	0.25%
INERT INGREDIENTS**:	<u>99.67%</u>
	100.00%

*MGK® 264, Insecticide Synergist

**Contains petroleum distillate

MGK® - Registered trademark of McLaughlin Gormley King Co.

KEEP OUT OF REACH OF CHILDREN CAUTION

See Side Panel for Additional Precautions

NET CONTENTS:

ACCEPTED
with COMMENTS
in EPA Letter Dated

EPA REG. NO 11715-320 EPA EST. NO. 11715-TN-1

AUG 20 2003

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

11715.320

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS & DOMESTIC ANIMALS CAUTION

Harmful if absorbed through skin or inhaled. Avoid contact with skin, eyes or clothing. Avoid breathing vapors or spray mist. Causes eye irritation. Remove contaminated clothing and wash before reuse. Wash thoroughly with soap and water after handling.

Remove pets, birds, and cover fish aquariums before spraying.

Do not allow children or pets to contact treated surfaces until spray has dried.

FIRST AID		
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.	
IF INHALED:	Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respsiration, preferably by mouth-to-mouth, if possible. 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. Call a poison control center or doctor for treatment advice.	

IF SWALLOWED:

- Immediately call a poison control center or doctor.
- Do not induce vomiting unless told to do so by a posson control center or docto.
- 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 pesticide is toxic to fish and aquatic invertebrates. Do not apply directly to any body of water.

PHYSICAL OR CHEMICAL HAZARDS

FLAMMABLE: Keep away from heat, sparks, and open flame. Do not use under or around gas stoves, water heaters, or other gas utilities (including home heating units) with open flames or pilot lights. Contents under pressure. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

Do not use this product in or on electrical equipment due to the possibility of shock hazard.

DIRECTIONS FOR USE

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

SHAKE WELL BEFORE USING

GENERAL: Use this spray as a spot or crack and crevice treatment to control cockroaches. fleas, silverfish, ticks, waterbugs, and other insects listed below. Apply this product only as a coarse spray or crack and crevice treatment to localized areas where pests are found or may occur. Spray surfaces until wet. Repeat as needed. 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, cover all food handling surfaces and cover or remove all food and cooking utensils, or wash thoroughly after treatment.

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 or bottling).

Avoid contamination of food and feedstuffs.

Not for use in Federally Inspected Meat and Poultry Plants.

FOR SPOT TREATMENT:

To Kill Ants, Black Widow Spiders, Carpet Beetles, Cockroaches, Crickets, Scorplons, Silverfish, Sowbugs, and Spiders: Spray areas where these insects are found or may hide, including dark corners of rooms and closets; cracks and crevices in walls; along baseboards and door and window frames; behind and beneath sinks, stoves, refrigerators, and cabinets; and around garbage cans, plumbing, and other utility installations. Pests driven out of hiding places should sprayed directly. For ants, spray ant trails and around doors and windows, and wherever else these pests may find entrance. Repeat as necessary.

To Kill Brown Dog Ticks and Fleas: Thoroughly spray as a spot treatment to infested areas such as pet beds and resting quarters, nearby cracks and crevices, along and behind baseboards, window and door frames, and localized areas of floor and floor coverings where these pests may be present. Pet's old bedding should be removed and replaced with clean, fresh bedding after treatment. DO NOT SPRAY PETS WITH THIS PRODUCT. Pets should be treated with a registered flea and tick control product prior to re-entering treated areas.

FOR CRACK AND CREVICE TREATMENT:

To Kill Ants, Black Widow Spiders, Brown Dog Ticks, Carpet Beetles, Cockroaches, Crickets, Fleas, Scorpions, Silverfish, Sowbugs, and Spiders: Apply spray in small amounts directly into cracks and crevices. Equipment capable of delivering a pin stream should be used in points between different elements of construction, between equipment and floors, openings leading to voids and hollow spaces in walls, equipment legs and bases where these 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 handling surfaces.

Flies and Mosquitoes: Use only outdoors as an aid in reducing annoyance from these insects. Spray outside surfaces of window and door frames as well as other areas where these pests may enter the home. Also spray dark corners and localized resting areas (such as under eaves) or porches, patios, and garages where these insects may congregate. Flies and mosquitoes coming to rest on treated surfaces will be killed. Repeat treatment when necessary.

STORAGE AND DISPOSAL

STORAGE: Store in a cool, dry place. Keep container closed.

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 product not in strict accordance with directions given herewith.

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

C:\MSPUB\REG320.PUB-(9/2-97)11715-320-NOTIF-2001-1&6(5-5-03)