



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

September 11, 2003

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


Subject: Label Amendment - Updating First Aid Statement per PR Notice 2001-1,
Disposal Instructions per PR Notice 2001-6
Speer Py-Perm Aqueous Insect Killer #2
EPA Reg. No. 11715-321
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 listed 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. Revise front of the label-- replace "Inert Ingredients" with the phrase "Other Ingredients".
2. Either delete all "Repeat treatment as necessary" and "Repeat as necessary" or clarify reapplication limitation. Efficacy and/or domestic animal safety data should be taken into consideration in determining the reapplication limitation.
3. Since the product contains more than 10% petroleum distillate in the formulation add under the ingredients statement "Contains petroleum distillate". Replace "Have person sip a glass of water if able to swallow" with "Do not give any liquid to the person."
4. Add "NOTE TO PHYSICIAN" section, including the statement "Contains petroleum distillate - vomiting may cause aspiration pneumonia".
5. Move the statements beginning, "Avoid contamination of feed and", and ending "...until surfaces are dry.", under the Directions for Use section of the label.

Note, the If on skin or clothing and If in eyes first aid statements are not required, based on the acute toxicity (Toxicity Category IV). You may carry the statements if you wish. If you have any questions regarding this action, please contact BeWanda Alexander of my team at (703) 305-7460.

Sincerely,

George T. LaRocca
Product Manager (3)
Insecticide Branch
Registration Division (7505C)

SPEER PY-PERM AQUEOUS INSECT KILLER #2

- Contains Pyrenone® and Permanone®
- Controls Residential and Garden Insects
- Seeks Out Bugs Where They Hide
- Kills On Contact
- For Household Use
- Non-Staining
- A Broad Spectrum Insecticide Highly Effective Against Ants, (Including Carpenter Ants), Bees, Beetles (Including Carpet, Flour, Grain, and Ground Beetles), Centipedes, Clover Mites, Cockroaches, Crickets (Including Mole Crickets), Earwigs, Firebrats, Millipedes, Moths, Pillbugs, Scorpions, Silverfish, Sowbugs, Spiders, Ticks, Wasps, and Other Pests Listed on the Label.
- Kills Lice and Their Eggs
- For Use On Bedding, Furniture and Other Inanimate Objects Infested with Lice.
- No Unpleasant Odor
- Water-Based Formula
- For Use on Dogs and on Premises to Control Fleas and Ticks.
- Controls Fleas and Ticks on Dogs for 14 Days.

ACTIVE INGREDIENTS:

Pyrethrins.....	0.10%
Piperonyl Butoxide, Technical*.....	0.50%
Permethrin**.....	0.20%
INERT INGREDIENTS:.....	99.20%
	100.00%

*Equivalent to min 0.4% (butylcarbityl)(6-propylpiperonyl) ether and 0.1% related compounds.

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

Pyranone and Permanone - Registered Trademarks of Roussel Uclaf Corporation.

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

See Side Panel For Additional Precautions

NET CONTENTS: _____

EPA REG. NO. 11715-321
EPA EST. NO. 11715-TN-1

**READ ENTIRE LABEL BEFORE EACH USE
ON ANIMAL USE IS FOR DOGS ONLY**

PRECAUTIONARY STATEMENTS HAZARD TO HUMANS & DOMESTIC ANIMALS CAUTION

Harmful if inhaled. Avoid breathing vapor or spray mist. Remove contaminated clothing and wash before reuse. Avoid contamination of feed and foodstuffs. Remove pets and birds and cover fish aquaria before spraying. Vacate room after treatment and ventilate before re-occupying. Do not allow children or pets to contact treated areas until surfaces are dry.

FIRST AID	
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 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 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.

**ACCEPTED
with COMMENTS
In EPA Letter Dated
SEP 11 2003**
Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
11715-321

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.
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

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 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.

Do not use in food/feed areas of food/feed handling establishments, restaurants or other areas where food/feed is commercially prepared, processed or stored. Not for use in Federally Inspected Meat and Poultry Plants.

SHAKE WELL BEFORE USING

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.

Do not use in rooms/areas while occupied by patients, the elderly or infirm. Do not apply to classrooms when in use.

Remove protective cap, hold container upright and spray from a distance of 12 to 15 inches.

INDOORS:

Cluster Flies, 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, moving toward the door. 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 tufts and seams. Take beds apart and spray into all joints. Treat baseboards, moldings and floors. Repeat treatment as necessary. Allow all sprayed articles to dry thoroughly before use.

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.

Fleas in buildings - Space spray: Hold can 36 inches above floor and direct spray toward floor and lower walls at a rate of 10 seconds per 100 sq. ft. making sure that all floor, sofa and chair surfaces are contacted. Leave room and keep area closed for 15 minutes. Open and ventilate before re-occupying. Repeat treatment after 7 days or as needed.

Fleas & Ticks (Adults and Larvae): Remove and thoroughly clean or destroy pet bedding. Spray pet sleeping quarters, bed, entire floor and floor covering, with special attention to cracks and crevices around baseboards, and window and door frames. Infested upholstered furniture and mattresses may also be treated with this product. A test application should be made to upholstery or drapery fabrics in an inconspicuous place before use.

TO CONTROL Fleas, Ticks and Lice on dogs ONLY: Starting at the head, stroke against the lay of the hair, spraying the parted fur in short bursts, directly behind the hand to insure penetrating the coat. Dampen the fur back to the tail. Repeat application weekly if needed to control infestations. **NOTE: Do not use on puppies less than twelve weeks old.** Consult a veterinarian before using this product on debilitated, aged, pregnant or nursing animals, or animals on medication. 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.

TO KILL Lice and Louse eggs: Spray in an inconspicuous area to test for possible staining or discoloration. Inspect again after drying, then proceed to spray entire area to be treated. Hold container upright with nozzle away from you. Depress valve and spray from a distance of 8 to 10 inches. Spray each square foot for three seconds. Spray only those garments and parts of bedding, including mattresses and furniture that cannot be either laundered or dry cleaned. Allow all sprayed articles to dry thoroughly before use.

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.

FLYING INSECTS: Flies, Mosquitoes, Gnats, Small Flying Moths, Hornets, Wasps 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.

Mud Daubers and Wasp Nests: Spray mist directly on insects and their nests from approximately 2 feet away. Contacted insects will fly away from fog. Applications should be made in the late evening when insects are at rest. Spray into hiding and breeding places contacting as many insects as possible.

CRAWLING INSECTS: Ants, Cockroaches, including Asian Cockroaches, Crickets, Mole 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.

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

May be used on plants such as African violets, 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 cautious 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. Do not transport or store below 32°F.

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 responsibility for safety and use not in accordance with directions.

In case of emergency or for product use information, please call 901/362-1950 Monday thru Friday CST (Distributors may elect to use their own phone numbers and hours of operation).

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

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