



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

AUG 19 2002

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

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

Subject: I. Label Amendment Revising Flammability Statement: and
II. Revised Basic Confidential Statement of Formula (CSF).
Yard & Patio Fogger
EPA Reg. No.: 11715-325
Your Submission Dated June 6, 2002

Dear Mr. Washburn:

I. Label Amendment:

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. You must correct the third footnote (***) to the ingredient statement. Since the product contains 1.00% piperonyl butoxide (PBO) and the source product is 80% PBO and 20% related compounds, it should read as follows:

***Equivalent to min. 0.8% (butylcarbityl)(6-propylpiperonyl) ether and 0.2% related compounds"

2. As specified in the Notice of Registration, dated January 24, 2002, you must remove the statement "Repeat treatment as necessary" from the directions for residual treatments. The interval for residual surface treatments should be changed to 14 days.

3. Under "Crawling Insects", "Cockroaches" is listed twice. Please delete one occurrence of this pest.

II. Revised Basic CSF:

The Confidential Statement of Formula (CSF), referred to above and submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. A copy of the CSF (Basic Formulation, dated June 6, 2002) has been placed in our file for the subject product. This CSF supersedes previously submitted CSFs for this product.

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

Sincerely,



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

Enclosure

YARD & PATIO FOGGER

- Fogs (Sprays) up to 15 feet away
- Treat Up to 10,000 Square Feet
- Quick Knockdown
- A broad spectrum insecticide highly effective against Ants, Carpenter Ants, Bees, Carpet Beetles, Centipedes, Clover Mites, Cockroaches, Crickets, Earwigs, Firebrats, Fleas, Grain Beetles, Millipedes, Mole Crickets, Mosquitoes, Moths, Pillbugs, Scorpions, Silverfish, Sowbugs, Spiders, Ticks, Wasps, and many other pests

**ACCEPTED
with COMMENTS
In EPA Letter Dated:**

AUG 19 2002

**Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
11715-325**

ACTIVE INGREDIENTS:

Etofenprox*0.50%
Tetramethrin**0.20%
Piperonyl Butoxide, Technical***1.00%
INERT INGREDIENTS:98.30%

*2-(4-Ethoxyphenyl)-2-methylpropyl 3-phenoxybenzyl ether

**1-cyclohexene-1,2-dicarboximidomethyl-2,2-dimethyl-3-(2-methylpropenyl) cyclopropanecarboxylate

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

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

See Side Panel For Additional Precautions.

NET CONTENTS:

EPA REG. NO. 11715-325

EPA EST. NO. 11715-TN-1

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

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

CAUTION

Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash hands thoroughly with soap and water after handling. If clothing becomes contaminated, remove and launder before use.

FIRST AID	
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.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not apply directly to water. Do not contaminate water when disposing of equipment washwaters.

PHYSICAL OR CHEMICAL HAZARDS

Flammable. Contents under pressure. Keep away from heat, sparks, and 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.

Repeated exposure to etofenprox can cause skin irritation.

**FOR OUTDOOR USE ONLY
SHAKE WELL BEFORE USING**

Remove protective cap, hold container upright and spray from a distance of 10 to 15 feet.

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 on Outside Surfaces 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 surface 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, 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 trails and hills.

Ants, Ticks, Crickets, Fleas and Earwigs: Apply thoroughly to infestations in bushes, grass or weeds.

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 a 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.