

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
SPI Deltamethrin Aerosol Insecticide
EPA Registration No. 11715-334
Your Submission Dated May 8, 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 statement "Remove pets, birds . . . before spraying" to the "Directions for Use" section of your label.
2. Delete the phrase "No Unpleasant Odor." This is a subjective statement based on the sensitivity of the user.
3. Either delete the phrase "Repeat treatment as necessary" or indicate a time period for retreatment based upon the residual efficacy of your product. Please explain why you can repeat the application of your product every week when you make a 4 week claim for residual action.
4. Add the following statement to the "Directions for Use" section: Do not use in rooms/areas while occupied by patients, the elderly or the 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.
5. Add the following statement to the "Directions for Use" section of the label "Do not allow children or pets to contact treated area until surfaces are dry."

6. Revise the statement "Spray surface until slightly wet" to read "Spray surface until slightly wet but not to the point of runoff."

Since this product is in Toxicity Category IV you are not required to carry first aid statements. However, we have no objection to retaining the statements on the proposed labeling.

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

SPI DELTAMETHRIN AEROSOL INSECTICIDE

- For Household and Domestic Use
- Contains Delta Gard® Insecticide and Esbiol® Insecticide
- Contains Deltamethrin and S-bioallethrin
- Water-Based Formula
- Water-Based
- Killing Action and Residual Control
- Fast Knockdown Formula
- Long-Lasting Control
- For Indoor/Outdoor Use
- Kills Fleas-Roaches-Ants-Spiders
- Kills On Contact
- Kills Hidden Bugs
- Kills Bugs You See and Even the Ones You Don't See
- Broad Spectrum Insect Control
- Highly Effective Against Ants, Bees, Carpenter Ants, Carpet Beetles, Centipedes, Cockroaches, Crickets, Firebrats, Fleas, Flour Beetles, Grain Beetles, Ground Beetles, Mole Crickets, Moths, Pillbugs, Scorpions, Silverfish, Sowbugs, Spiders, Ticks and Many Other Crawling Insects In and Around Homes, Recreational Vehicles, Cabins, Tents and other Recreational Structures
- Not for use on plants grown for sale or other commercial use
- No Oily Residue- No Unpleasant Odor
- No Greasy Residue-Non Staining
- Won't Stain Carpets and Floors
- Protects For up to 4 Weeks
- Keeps on Killing for up to 4 Weeks
- Keeps on Killing
- Contains No CFC's or other ozone depleting substances. Federal regulations prohibit CFC propellants in aerosols
- Use SPI Deltamethrin Aerosol and you will have "Delta Blow" to your home invading bugs.
- Guard your home with DeltaGard®

ACTIVE INGREDIENTS

S-Bioallethrin..... 0.05%
Deltamethrin..... 0.02%
OTHER INGREDIENTS:99.93%
100.00%

DeltaGard and Esbiol are registered trademarks of The Aventis Group

KEEP OUT OF REACH OF CHILDREN

CAUTION ACCEPTED with COMMENTS in EPA Letter Dated

See Side Panel for First Aid and Additional Precautions

NT. WT. AUG 14 2003

EPA REG. NO. 11715-334
EPA EST. NO. 11715-TN-1
Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No.

11715-334

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Remove pets, birds and cover fish aquariums before spraying.

FIRST AID	
IF SWALLOWED:	<ul style="list-style-type: none"> • 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 person. • Do not give anything by mouth to an unconscious person.
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 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.
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 water. This product is highly toxic to bees exposed to direct treatment or residues on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds if bees are visiting the treatment area.

PHYSICAL OR CHEMICAL HAZARDS

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 or on electrical equipment due to the possibility of shock hazards.

DIRECTIONS FOR USE

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

SPI Deltamethrin Aerosol works in two ways: 1) it kills bugs fast on contact; and 2) its residual action keeps on killing for up to 4 weeks after you spray. Contact kill gives you immediate results when spraying insects directly, while residual activity kills insects when they return to treated areas.

SHAKE WELL BEFORE EACH USE

Hold container upright. Do not spray up into air. Apply to surfaces only. Remove protective cap and direct spray away from face. Hold can 12-15 inches from surface being sprayed. Press button down and spray as directed. Spray surface until slightly wet.

SPI Deltamethrin Aerosol will not stain surfaces or fabrics where water alone causes no damage.

SPI Deltamethrin Aerosol insecticide is intended for use in and around residential structures and their immediate surrounding. Permitted areas of use include: **apartments, atriums, attics, automobiles, basements, bathrooms, boats, cabins, campers, carports, cat sleeping quarters, clothes storage, condominiums, decks, dens, driveways, garages, gazebos, homes, kitchens, lanais, living rooms, parlors, patios, pet sleeping areas, play rooms, porches, recreational vehicles, rooms, solariums, storage areas, sun rooms, utility rooms and verandahs.**

INDOORS:

Cockroaches (including adult and immature stages of both non-resistant and organophosphate and carbamate resistant strains), **ants, boxelder bugs, centipedes, crickets, dermestids, firebrats, fleas, palmetto bugs, silverfish, sowbugs, ticks and waterbugs:** Apply as a spot and crack & crevice treatment to areas where these pests crawl and hide, especially in hidden areas around sinks and storage areas, behind baseboards, around doors and windows, behind and under refrigerators, cabinets, sinks and stoves, the underside of shelves, drawers, bookcases, and similar areas. When pests are driven out, spray directly. Cover all food handling surfaces and cover or remove all food and cooking utensils or wash thoroughly after treatment. Exposed food should be covered or removed. Repeat as necessary but not more than once per week.

[**Roaches:** Spray in cracks and crevices, around baseboards and other hiding places until wet. When driven out, spray bugs directly.]

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Ants: Spray ant trails and around doors and windows and other places where ants enter the house. Repeat as necessary but not more than once per week.

Carpenter Ants: For effective control, locate and treat nests and surrounding areas. Apply around doors and windows and other places where ants enter premises and where they crawl and hide. Spray into infested wood through existing openings.

Ticks and Fleas on Surfaces: Remove pet bedding and destroy or clean thoroughly. Spray pet resting quarters. Adult fleas and larvae contacted by spray will be killed. Put fresh bedding down once spray has dried. Do not spray animals directly. For best results, pets should be treated with an appropriate flea and/or tick control product registered for use on pets before allowing them to return to the treated area. Spray rugs and carpets where infestations are bad. Delicate fabrics should be tested for staining in an inconspicuous area prior to use.

Spiders: Apply along and behind baseboards, to window and doorframes, corners, pipes, storage localities, attics, crawl spaces and other areas over which these pests may crawl.

Centipedes, Ground Beetles, Pillbugs, Sowbugs, Scorpions and Ticks: Apply around doors and windows and other places where these pests may enter premises. Treat baseboards, storage areas and other locations where these pests are found.

[Silverfish, Crickets, Spiders, Earwigs: Apply around doors and windows, baseboards, storage areas, pipes and other areas infested by these pests or spray pests directly. Spray surfaces until wet.]

PANTRY PESTS – Grain Beetles (Rusty, Merchant and Saw-toothed), Flour Beetles (Red and Confused), Chocolate Moths, Cigarette Beetles, Clover Mites, Cluster Flies, Drugstore Beetles, Elmleaf Beetles, Rice Weevils, Lesser Grain Borers, Spider Beetles and Tobacco Moths: Treat exposed stages. Remove all foodstuffs, utensils and shelf paper from area to be treated. Discard used shelf paper and any infested foodstuffs. Apply spray to shelves and in cracks and crevices behind and under cupboards and cabinets. Allow spray to dry prior to replacement of shelf paper, food and utensils. Wash any exposed food handling surfaces and utensils before use.

Carpet Beetles (Black, Furniture and Varied): Spray on and under edges of floor coverings, under rugs and furniture and in closets or other localities where these insects are found.

Webbing Clothes Moths: Use this product as a crack and crevice treatment in closets and other storage areas

where these pests are found. This is an adjunct treatment and will not control moth larvae already on clothes. It does not apply to clothing.

OUTDOORS:

Point nozzle away from face. Hold can on a slight downward angle, approximately 12 – 15 inches from surface to be sprayed. For best results spray when air is calm. Spray with wind if breeze is blowing. Do not contaminate fishponds or apply directly to water.

PESTS ON OUTSIDE SURFACES OF BUILDINGS:

For control of building infestation to **ants, clover mites, crickets 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.

CRAWLING INSECTS: ants, cockroaches (including Asian cockroaches), centipedes, crickets, mole crickets, water bugs 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 anthills for best control.

Ants: Spray around ant trails and hills. Spray around nests hidden under steps, brickwork, concrete, etc. Break apart accessible nests and spray on and around debris until surface is slightly wet. Repeat as necessary but not more than once per week.

[Ants: Spray ant trails and hills. If nest can be located, spray surface of nest until wet.]

Fire Ants (Aids in Control): To kill active foraging ants on the surface, sweep surface with spray from a distance of 18 inches. For control of fire ants and mounds use a product registered for treating the mound. For best results apply in cool weather or in early morning or late evening.

Lone Star Ticks, Dog Ticks, Crickets, Fleas and Earwigs: Apply thoroughly to infestation in bushes, grass or weeds.

Wasps, Hornets and Bees: Spray nests and bees directly. Aim spray at nest openings. Applications should be made late in the evening when insects are at rest.

FLYING INSECTS: Houseflies, gnats, mosquitoes and small flying moths: Use only on outdoor surfaces. Spray outside surfaces of window and doorframes and other areas where these pests may enter the home. Also spray localized resting areas, such as under eaves.

porches, surfaces around light fixtures and cords, railings, etc. where these insects may rest. Insects coming to rest on treated surfaces will be killed.

FOR THE CONTROL OF ORNAMENTAL GARDEN INSECTS: For use on roses, dahlias, asters and other ornamentals to kill **Japanese beetles** hit by spray as well as **whiteflies, aphids, army worms, lace bugs, mealy bugs, exposed thrips, pavement ants, spiders, spider and red mites, clover mites and leafminers.**

May be used on plants, as well as multi-purpose spray in small ornamental gardens and for spot treatments of incipient insect infestations to prevent spreading in large garden areas.

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

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. Spray insects directly, whenever possible. Repeat treatment as necessary, but not more than once per week.

[Indicates alternate text.]

STORAGE AND 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.

In case of medical emergencies or health and safety inquiries, or in case of fire, leaking, or damaged containers, information may be obtained by calling 1-901-362-1950.

For customer service call 901-362-1950, Monday – Friday, 8:00 a.m. to 4:30 p.m.

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

Netserver/Reg/SPLabels-11715-334-NOTIF-2001-1&6(5-8-03)