11715-335 8/28/2003

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

AUG 2 8 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 and Disposal Statements

SPI Deltamethrin Indoor/Outdoor Insect Killer

EPA Registration No. 11715-335 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. 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."
- 2. 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 your residual action. Either delete all weekly claims or indicate a time period for retreated based on the residual efficacy of your product.
- 3. Add "or served" to the end of the statement beginning Do not use in commercial food handling . . ." i.e., ". . . where food is commercially prepared, processed or served."
- 4. 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."

The If on Skin and If in eyes first aid statements are not required since they are in Toxicity Category IV. You may delete these statements if you prefer.

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 INDOOR/OUTDOOR **INSECT KILLER**

- · For Indoor and Outdoor Use
- · Ready-To-Use
- Easy-To-Use
- · Water-Based
- · Kills on Contact
- Kills Fast
- Long-Lasting
- · Keeps Killing for up to 4 [8, 12,16] Weeks
- . Keeps Killing for up to 1 [2, 3, 4] Months
- . Keeps Killing for up to 30 [60, 90, 120] Days
- No Drips No Runs
- · Stays Where You Put It
- Odorless
- · Non-Staining
- · Does Not Stain Surfaces
- Does Not Stain Fabrics
- · No Oily (Greasy) Residue
- · Contains Deltamethrin the third generation pyrethroid
- · Contains DeltaGard®
- · No Shaking Required
- · No Shake Formula
- . Novel No Drip Formula
- · For Use in and Around Horse Stables
- For Use On House Plants
- For Use On Ornamental Plants
- Kills Fleas & Ticks
- · Kills Home Invading Pests
- Kills Spiders, Centipedes and Scorpions
- · Kills Roaches, Ants and Fleas on Contact
- Kills Pantry Pests
- · Kills Plant Pests
- · Kills Aphids, Mealy Bugs, Lace Bugs, Thrips, Leafminers and Mites
- · Kills Spider Mites
- · Kills Japanese Beetles
- . Not for Use on Plants Grown for Sale or other Commercial Use

ACTIVE INGREDIENTS:

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Deltamethrin	0.02%
OTHER INGREDIENTS:	<u>99.98%</u>
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DeltaGard is a registered trademark of the Aventis Group.

KEEP OUT OF REACH OF CHILDRENTS in KPA Letter Dated

CAUTION

See Side Panel for Additional Presentions 8 2003

NET CONTENTS

Ender the Federal Insecticide, EPA REG. NO.: 11715-335 Fungicide, and Rodenticide Act EPA EST. NO.: 11715-TN-0188 amended, for the pesticide registered under EPA Reg. No.

11715-335

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS & DOMESTIC ANIMALS CAUTION

Contact with product may result in transient tingling and reddening of the skin. Avoid contact with skin or clothing.

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 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.

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 extremely toxic to fish and aquatic invertebrates. Do not apply directly to water. Do not contaminate water when disposing of washwater or rinsate. 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

Do not apply this product in or on electrical equipment due to 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.

General Information: Hold container upright. Do not spray up into air. Apply to surfaces only as a spot and crack & crevice treatment. Turn sprayer nozzle to "on" position. Hold approximately 12 inches from surface to be sprayed. Squeeze trigger to spray until surface is slightly moist.

SPI Deltamethrin Indoor/Outdoor Insect Killer's longlasting action keeps on killing for up to [30, 60, 90, 120] days; 4, 8, 12, 16 weeks; 1, 2, 3, 4 months] after you spray. Contact kill gives you immediate results when

spraying insects directly, while residual activity kills insects when they return, to treated area. SPI Deltamethrin Indoor/Outdoor Insect Killer will not stain surfaces or fabrics.

SPI Deltamethrin Indoor/Outdoor Insect Killer is intended to be used in and around residences and their immediate surroundings, such as (but not limited to): apartments, atriums, atties, automobiles, basements. bathrooms, boats, rabins, 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, Do not use in commercial food handling establishments. restaurants or other places where food is commercially prepared or processed.

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. 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.

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 (including ticks that may cause Lyme disease) 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

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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, Pilibugs, 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: Apply to areas infested by theses pests.]

FLYING INSECTS: Houseflies, Gnats, Mosquitoes and Small Flying Moths: Spray localized resting areas, such as under eaves, porches, inside surfaces of window and door frames, surfaces around light fixtures and cords, railings, etc. and anywhere these insects may rest. Insects coming to rest on treated surfaces will be killed.

[FLYING INSECTS: Spray resting areas. Insects coming to rest on treated surfaces will be killed.] HORSE STABLES: To control stable flies, horn flies, house flies, face flies, horse flies, deer flies, mosquitoes and gnats: Apply thoroughly to surfaces until wet. Insects coming to rest on treated surfaces will be killed or repelled. Repeat treatment as necessary, but not more than once per week. Do not spray animals or humans, or apply to animal feed or watering equipment.

PANTRY PESTS: Grain Beetles (Rusty, Merchant and Sawtoothed), 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 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 theses pests are found. This is an adjunct

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treatment and will not control moth larvae already on thes. Do not apply to clothing.

BEDBUGS: Remove linens and wash before reuse. Lightly spray mattresses, especially tufts, folds and edges. Apply to the interior of the frame. Allow to dry before remaking bed.

OUTDOORS:

Point sprayer away from face. Hold sprayer on a slight downward angle, approximately 12 inches from surface to be sprayed. Spray with wind if breeze is blowing. Do not contaminate fish ponds 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 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 but not more than once per week.

CRAWING INSECTS: ants, cockroaches (including Asian cockroaches), centipedes, crickets, mole crickets, water bugs and silverfish. Spray infested surface of patio or picnic area. Also spray legs of tables and chairs.

Amts: Spray freely around ant trails and hills. Spray around nests hidden under steps. brickwork, concrete, etc. Break apart accessible nests and spray freely on and around debris. 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.]

Lone Star Ticks, Dog Ticks, Crickets and Fleas: Apply thoroughly to infestation in bushes, grass or weeds. Retreat weekly if necessary.

Wasps, Hornets, Yellow Jackets and Bees: Spray nests and other surfaces where bees may rest. 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: 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.

Termites, Carpenter Ants and Carpenter Bees: (for localized control only.) Apply SPI Deltamethrin

Indoor/Outdoor Insect Killer to voids or channels in damaged wood of a structure, or, to cracks, crevices and spaces in and between wooden portions of a structure or between wood and the foundations, in locations vulnerable to attach such as crawl spaces. Retreat if needed but not more than once per week.

For termites, the purpose of such applications is to kill workers or winged forms, which may be present in the treated areas at the time of application. Not recommended as sole protection against termites. For active infestations, get a professional inspection. Such applications are not a substitute for mechanical alteration, soil treatment or foundation treatment but are merely a supplement. For severe termite infestation, contact a professional pest control operator in your area.

HOUSE PLANTS: To control aphids, Japanese beetles, lace bugs, leafminers, mealy bugs, mites and spider mites on house plants. Prior to spraying, remove plants from living and eating areas. Put in an area not likely to come in contact with pets, children, or food. Plants can be returned to original location when leaves dry. If plants cannot be moved, cover or remove exposed food and food handling surfaces. Avoid spraying surrounding areas.

Apply spray to upper and lower surfaces of foliage. Avoid wetting blossoms if possible. Repeat applications as necessary but not more than once per week.

FOR 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 a multi-purpose spray in small ornamental gardens and for spot treatments to prevent insects from spreading into 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. Be cautious about wetting tender foliage, young plants and new growth. Do not spray plants when temperatures exceed 90°F. DO NOT apply to vegetable plants or other plants used for food. Spray insects directly, whenever possible. Repeat treatment as necessary but not more than once per week.

[Indicates alternate text.]

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STORAGE & DISPOSAL

STORAGE: Store in a cool, dry area away from children. Protect from freezing. (Store above 32° F/ Do not store below 32° F). If freezing occurs allow product to thaw and shake well before using (use). (Some product separation may occur on freezing which is reversible on shaking). Freezing does not adversely affect this product performance.

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.

In case of medical emergencies or health and safety inquires, 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

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