

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

October 6, 2003

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17 5-742282

Speer Products, Inc.
4242 B.F. Goodrich Boulevard
Memphis, TN 38181-0993

Attention: Mr. Bill Washburn:

Subject: Chaperone Squirrel and Bat Repellent
EPA Reg. No. 11715-342
Your amended application of June 18, 2003

Purpose The purpose of this submission, under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), is to revise the first aid text of your label in accordance with PR Notice 2001-1 and 2001-6.

Label review The labeling submitted with the above letter, under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) is acceptable, provided you submit one (1) copy of final printed labeling to us, with the following changes, before you ship your product.

1. We suggest revising your "FIRST AID" text as indicated in Enclosure 1.
2. Change the registration number to "EPA Reg. No. 11715-342.
3. Change the company name and address to:

Speer Products, Inc.
4242 B.F. Goodrich Boulevard
Memphis, TN 38181-0993

4. Revise your establishment number if it has changed.

5. Revise your "STORAGE AND DISPOSAL" text as follows:

STORAGE AND DISPOSAL

Storage: Store only in original container in a cool, dry place inaccessible to children and pets.

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 call 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

A copy of the stamped label is enclosed for your records.

**Existing
stocks**

Stocks of existing labels may be used for eighteen (18) months.

**Consequence
for non-
compliance**

If this condition is not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of this condition.

Questions

If you have questions about this letter, please contact me at 703-305-5407 (by phone), 703-305-6596 (by fax), or peacock,dan@epa.gov (by E-Mail).

Sincerely yours,



Daniel B. Peacock, Biologist
Insecticide-Rodenticide Branch
Registration Division (7504C)

Enclosures

1. Suggested First Aid Text
2. Minimum Type Sizes for Final Printed Labels

**Letter
location**

Dan Peacock,Disk 122,A:\Naphthalene\11715-342, revised label,9-29-2003.wpd

Enclosure 1. Suggested First Aid Text

FIRST AID	
Have label with you when obtaining treatment advice, including 1-602-285-1660 ¹ .	
If swallowed	<ul style="list-style-type: none"> •Call a 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.
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 immediately 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 mouth-to-mouth, if possible. •Call a poison control center or doctor immediately 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 immediately for treatment advice.

¹Call 1-602-285-1660 for **medical emergencies**; health concerns; pesticide incidents; fire; leaking or damaged containers; or product use information. [Note: At your option, you can substitute the toll-free telephone number for the National Pesticide Information Center (NPIC) at 1-800-858-7378.]

CHAPERONE SQUIRREL and BAT REPELLENT

Active Ingredient:

Naphthalene 100.00%

KEEP OUT OF REACH OF CHILDREN

WARNING

SEE BACK PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

EPA Reg. No. 270-248

EPA EST NO. 67572-GA-1

Net Contents: _____

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

OCT 6 2003 PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

WARNING

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

11715-342 May be fatal if inhaled. Harmful if swallowed. Avoid breathing vapors or dust. Avoid contact with skin, eyes, or clothing.

Environmental Hazards

This product is toxic to fish. Do not contaminate water by cleaning of equipment or disposal of wastes.

FIRST AID

IF INHALED:

- Move person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.
- Call a poison control center or doctor for further treatment advice.

IF SWALLOWED:

- Call a 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.

	<ul style="list-style-type: none"> 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 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.
In case of medical emergencies or health and safety inquiries, or in case of fire, leaking or damaged containers or for product use information, call 602-285-1660.	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	

NOTE TO PHYSICIAN: If breathing is difficult, give oxygen.

DIRECTIONS FOR USE

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

FOR CONTROL OF CLOTHES MOTHS

Use Restrictions: For control of eggs, larvae, and adult clothes moths in containers, garment bags, and storage closets designed to be airtight. Do not use in containers, dry cleaning and garbage bags, or closets that allow vapors to escape into occupied rooms. Do not use this Naphthalene-containing product with any other moth control chemical. For use only on cloth containing wool or wool blends.

Application Directions: Before storing, dry clean, wash or brush articles to be protected. Store only in a clean, airtight container (e.g., trunk, chest), garment bag, or storage closet. Apply at the following rates:

Pounds of Product Area of Tightly Enclosed Space

$\frac{1}{4}$	Average Garment Bag
$\frac{1}{3}$	Large Trunk
1	50 cu. Ft.
2	100 cu. Ft. (Normal Closet)

Keep product in container, bag, or closet for a minimum of seven (7) days. Odor dissipates when treated articles are aired.

Retreatment: Since moths are active all year, replenish containers, bags, and closets two times a year.

FOR CONTROL OF TREE SQUIRRELS, BATS, STARLINGS, PIGEONS, AND HOUSE SPARROWS

Use Restrictions: To repel tree squirrels, bats, starlings, pigeons, and house sparrows from attics and wall voids.

Application Directions: Spread flakes on floor or apply between walls, using about one pound for every 400 cubic feet. Tree squirrels, bats, and birds will depart from treated space within a short time, after which all openings through which they gain entrance, such as small crevices around eaves, bases of rafters, around dormers, should be closed by means of strips of wood, metal or by the use of oakum.

STORAGE AND DISPOSAL

STORAGE: Do not contaminate water, food or feed by storage or disposal. Store in a cool, dry place inaccessible to children and pets. **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 call 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

Manufactured for:
Sudbury Consumer Products Company
Division of Farnam Companies, Inc. Phoenix, AZ 85013

270-248
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