



12/30/2003

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

DEC 30 2003

1/8
OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

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 Statements
Lawn & Ornamental Granular Insecticide
EPA Registration No. 11715-351
Your Submission Dated June 18, 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. In the "Precautionary Statements" section, move the statements "Food utensils such as...is dry" to the "Directions for Use" section of your label.
2. Your label states that the subject product "Provides contact and residual control for up to 4 weeks." Accordingly, you should either delete the phrase "Re-treat as necessary" or indicate a time period for retreatment based upon the residual efficacy of your product.
3. Under Directions for Use add, "Not for use in commercial greenhouses, nurseries, on sod farms or grass grown for seed."
4. Under Directions for Use delete "Do not allow runoff to occur."
5. Add referral statement on front panel, "See side/back panel for additional precautions."

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

LAWN & ORNAMENTAL
GRANULAR INSECTICIDE

- Kills Insects in Lawns
- Lawn & Garden Insect Control
- Treats Up to [5,000, 10,000, 15,000] sq. ft.
- Controls Home Invading Pests
- 10 Pounds Treats Up to 5,000 sq. ft.
- Controls Surface-Feeding Pests
- For Grass and Dichondra Lawns
- Contains Synthetic Pyrethroid
- Contains DeltaGard™
- Contains Deltamethrin
- For Outdoor Use on Home Lawns
- Ready-To-Use
- Provides Contact and Residual Control for Up to 4 Weeks
- Soluble Granule
- Complete Release of Active Ingredient
- For Outdoor Use in Ornamental Plant Beds
- Kills Ticks (including ticks that carry Lyme Disease)
- Convenient
- Total Release Granule
- Total [Quick] Release Formula
- Kills the Mound in 3 to 7 Days
- To Control Imported Fire Ants on Lawns and Recreational Fields
- Controls Fire Ants, Ticks and More
- Fast, Effective Kill of Fire Ants, Stinging Ants

ACCEPTED
with COMMENTS
in EPA Letter Dated

DEC 30 2003
Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
11715-351

ACTIVE INGREDIENT:

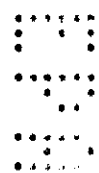
Deltamethrin.....0.1%

OTHER INGREDIENTS:.....99.9%

TOTAL.....100.0%

DeltaGard is a Trademark of AgrEvo Environmental Health, Inc.

EPA Reg. No. ~~270-312~~
11715-351

EPA Est. No. 



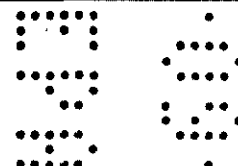
PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
CAUTION

Harmful if swallowed. Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling. Food utensils such as spoons and measuring cups must not be used for food purposes after use in measuring pesticides. Do not allow children or pets on treated areas until granules have been watered into the soil and the grass or soil is dry.

Environmental Hazards

This product is extremely toxic to fish. Do not apply directly to water. Use with care when applying in areas adjacent to any body of water. Do not contaminate water when disposing of equipment washwater.

| FIRST AID | |
|--|--|
| 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 poison control center or doctor. • 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. |
| In case of medical emergencies or health and safety inquiries, or in case of fire, leaking 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 | |



DIRECTIONS FOR USE

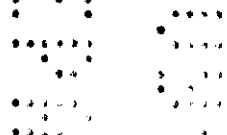
It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

READ ENTIRE LABEL. USE STRICTLY IN ACCORDANCE WITH LABEL PRECAUTIONARY STATEMENTS AND DIRECTIONS.

1. Determine size of area to be treated - measure and multiply length times width.
2. Determine appropriate spreader setting using chart.
3. Treat as directed - thorough coverage is important. Water in thoroughly with a half-inch of water. This product is extremely toxic to fish. Use with care when applying in areas adjacent to any body of water. Do not apply on saturated soil. Do not allow runoff to occur. Do not contaminate ornamental fish ponds.
4. Keep children and pets off treated areas until this material is washed into turf and grass is dry.

OVERALL LAWN TREATMENT FOR GRASS AND DICHONDRA LAWNS

TO CONTROL *Ants, Armyworms (including Fall, Yellow-Striped, etc.), Bermudagrass Mites, Billbugs (adult), Boxelder Bugs, Centipedes, Chiggers, Chinch Bugs, Clover Mites, Cockroaches, Crickets, Cutworms, Darkling Ground Beetles, Digger Wasps, Essex Skippers, Field Crickets, Fiery Skippers, Fire Ants, Flea Beetles (in dichondra), Grasshoppers, Hyperodes (Turfgrass Weevils), Japanese Beetles (adult), Lawn Moths, Leafhoppers, Mealybugs (adults), Scorpions, Silverfish & Firebrats, Sod Webworms, Sowbugs, Spiders, Spittlebugs, Springtails, Vegetable Weevils (in dichondra)*: Apply this product uniformly to home lawns, under shrubbery, and other ornamental recreational turf grass areas. Treat when insects first appear using granules at the rate of 2 to 3 pounds per 1,000 sq. ft. or, for heavy lawns such as St. Augustine grass, 3 pounds per 1,000 sq. ft. using a fertilizer spreader. See spreader setting chart below. To help obtain uniform distribution, apply one-half required amount of product in one direction, then apply the balance at a right angle. Immediately after application, water the lawn thoroughly with a half-inch of water. Re-treat as necessary.



CHINCH BUGS: Start treatments when temperatures reach 80°F or above. A second application may be necessary in 6 weeks if insect activity continues.

FLEA AND TICK CONTROL (OUTDOORS): In summer months, fleas and ticks frequently become established in lawns and pet resting areas surrounding the home. For best control of Fleas and Ticks (including but not limited to *Bear Tick*, *Black-legged Tick*, *Brown Dog Tick*, *Deer Tick*, *Lone Star Tick*, *Western Black-legged Tick*, *Wood Tick*), a regular treatment program should be followed. Treat once a month as directed above when pests first appear in late spring (May-June) and continue until late summer (September-October). Fall temperatures below 50°F decrease pest activity. Eliminating weeds around the home and mowing lawns frequently reduces the hiding places for these pests.

NOTE: Dogs, cats, their kennel or bedding area should also be treated with a registered product. In addition, if fleas and ticks are indoors on carpets or pet resting areas, use a registered product, ideally in combination with an Insect Growth Regulator. It is very important that all three sites - outdoors, indoors and also the pet - be treated with appropriate labeled products to achieve satisfactory control. If any one of these areas is not treated, it could serve as a source of reinfestation to the entire premises.

SOD WEBWORMS: Sod Webworms are the light brown caterpillars $\frac{1}{4}$ to $\frac{3}{4}$ inch long, that hide in the grass during the day and feed on the grass blades at night. Adult Webworms, usually referred to as Lawn Moths (about 1 inch in length with long snout) emerge from the grass at dusk. They fly over the lawn laying eggs that later hatch into destructive caterpillars. Damage appears first as small brown spots which, if not treated, may rapidly develop into large brown areas of severely damaged or dead grass. If Lawn Moths (Sod Webworm Adults) are noticed in large numbers at dusk, or at first sign of damage to lawn, treat entire lawn evenly following Overall Lawn Treatment directions.

BAND (PERIMETER) TREATMENT AROUND HOUSE FOUNDATION: To help prevent infestation of buildings by *Ants*, *Boxelder Bugs*, *Brown Dog Ticks*, *Centipedes*, *Cockroaches*, *Clover Mites*, *Crickets*, *Field Crickets*, *Fleas*, *Scorpions*, *Sowbugs*, *Spiders*, *Springtails* and *Ticks*: treat a band 5 to 10 feet wide around and adjacent to the building where pests are active and may find entrance. Treat at a rate of 1 to 1 $\frac{1}{2}$ pounds per 500 sq. ft. or 2 to 3 lbs. per 1,000 sq. ft.

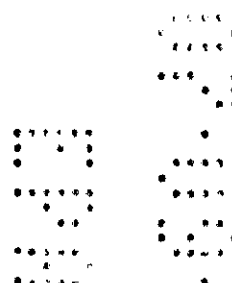
FLOWER, SHRUB AND ORNAMENTAL PLANT BEDS: To Control *Ants, Fire Ants, Crickets, Cutworms, Sowbugs, Pillbugs, Grasshoppers, Armyworms, Brown Dog Ticks and Springtails* apply granules evenly over soil within the beds and under shrubbery. Use the same dosage recommended for control of these pests in lawns. Water thoroughly with $\frac{1}{2}$ inch of water.

SPOT TREATMENT

ANTS NESTING OUTDOORS: This product may be used outdoors for the control of ants, including: *Acrobat, Argentine, Big Headed, Cornfield, Field, Harvester, Leafcutter, Little Black, Pavement and Pyramid Ants*. If possible, it is best to try to locate nest and treat this first. Nests will usually be found in the ground but may be concealed under stones, boards, slabs or in stumps or logs. Product should be applied to thoroughly cover the nest (1 to 2 teaspoons) and sprinkled gently with sufficient water to dissolve granules. In addition to treating ant nests or mounds, entry points of buildings (used by ants) and the soil surface along the perimeter of the building should be treated.

DIGGER WASPS: Apply 1 to 2 teaspoons of granules in and around each individual ground nest opening. Make the application at dusk when the wasps are not active.

FIRE ANTS: Apply one tablespoon over each 10" to 12" diameter mound and up to 2 feet around each fire ant mound to prevent escape of the queen. Immediately after application, water the granules into the soil gently with a light sprinkling to avoid disturbing the colony. Use at least 1 gallon of water per mound, but no more than 2 gallons. Use of high pressure watering equipment may disturb the colony and cause migration of the ants, thus reducing the effectiveness of the treatment. For maximum effectiveness, apply in cool weather (65-80°F), or in early morning or late evening for best results. Treat new mounds as they appear.



SPREADER SETTINGS [spreader setting numbers left blank-to be added to container labeling]

| Spreader Make and Model | Setting to Deliver | |
|---------------------------|------------------------|------------------------|
| | 2#/1000ft ² | 3#/1000ft ² |
| Scotts Drop Spreaders | | |
| Scotts EasyGreen Rotary | | |
| Republic EZ Drop | | |
| Cyclone Model B1 Rotary | | |
| Sears Craftsman Broadcast | | |

Note: Spreader settings given are approximate and variation can occur between identical models. User should calibrate spreader by accurately weighing a few pounds into your spreader and applying to a measured area. Then adjust spreader setting if necessary to assure correct rate of application.

STORAGE & DISPOSAL

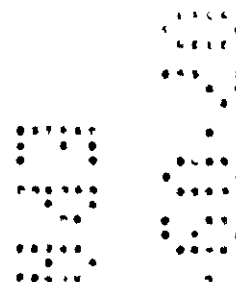
Storage: Store product in its original container in a cool, dry, locked place out of reach of children.

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.

Notice: Buyer assumes all risk of use, storage or handling of this material not in strict accordance with directions and usage. In no event shall seller's liability exceed the purchase price of this product.

Additional Optional Front Panel Bullet Points:

- Guaranteed to Work or Money Back
- Quick Kill of Fire Ants, Stinging Ants
- Kills Fire Ants on Contact
- Kills Fire Ant Workers
- Kills Fire Ant Queens
- Easy to Use
- 5 lb. Treats 150 Fire Ant Mounds
- 10 lb. Treats 300 Fire Ant Mounds



- 25 lb. Treats 750 Fire Ant Mounds
- Aids in Control of Mole Crickets
- Kills Insects Quickly
- Excellent Value for the Money
- Guaranteed Control of Lawn & Home Invading Insects, or Your Money Back
- Kills on Contact
- Long-Lasting Residual Action
- Long-Lasting Insect Control
- Lawn & Ornamental Granular Insecticide for a Healthier Lawn
- Easy & Quick to Apply with a Drop or Broadcast Spreader
- Kills: *ants, armyworms, (including fall, yellow-striped, etc.), bear ticks, bermudagrass mites, billbugs (adult), black legged ticks, boxelder bugs, brown dog ticks, centipedes, chiggers, chinch bugs, clover mites, cockroaches, crickets, cutworms, darkling ground beetles, deer ticks, digger wasps, essex skippers, field crickets, fiery skippers, fire ants, flea beetles (in dichondra), fleas, grasshoppers, hyperodes (turfgrass weevils), Japanese beetles (adult), lawn moths, leafhoppers, lone star ticks, Mealybugs (adult), scorpions, silverfish & firebrats, sod webworms, sowbugs, spiders, spittlebugs, springtails, ticks, vegetable weevils (in dichondra), western black legged ticks*

