

11715-353

12-4-2003

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

December 4, 2003

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

Subject: Label Amendment - Updating First Aid Statement in Accordance with PR Notice 2001-1, Disposal Instructions conforming to PR Notice 2001-6
Pramex 13.3% H&G Insect Control
EPA Reg. No. 11715-353
Submission Dated June 18, 2003 from previous registrant (Farnam Company Inc.)

Dear Mr. Washburn:

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. Revise the registration number to read "11715-353".
2. Since the product contains more than 10% petroleum distillate in the formulation, replace "Have person sip a glass of water if able to swallow" with "Do not give any liquid to the person" in the If Swallowed first aid statement.
3. Add "Harmful if swallowed" to the Precautionary Statements.
4. Revise the Environmental Hazards paragraph as follows: "This product is extremely toxic to fish and other aquatic organisms. Do not apply directly to water. Do not contaminate water when disposing of equipment washwaters. Apply, this product only as specified.
5. Replace the third sentence in the Precautionary statement, "Do not in eyes or on clothing" with "Do not get in eyes or on clothing".
6. Replace "(Lone Star, Bear, Black legged)" with "(Lone Star, Deer, Black Legged)" under the Direction for Use, in Ticks Section.

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7. Under Precautionary Statements you may delete the statement, "Do not use in food handling areas" since this product is for outdoor use.
8. Add under Directions for Use the following precaution, "Care should be used when spraying to avoid fish/reptile pets in/around ornamental ponds".

If you have any questions regarding this action, please contact BeWanda Alexander of my team at (703) 305-7460.

Sincerely,

A handwritten signature in cursive script that reads "BeWanda Alexander" followed by a stylized flourish.

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

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PRAMEX® 13.3% H & G INSECT CONTROL

- For Use On Plants
- Contains 1 lb/gal (120 g/L of Pramex Insecticide
- For Use Outdoors Around Buildings, Homes, In small Flower and Vegetable Gardens and on Fruit, Nut, and Ornamental Trees
- Water-Dilutable Low Odor Formula
- Economical, 8 oz. Makes Up To 48 Gallons
- Use on Lawns, Gardens and Fruit Trees

ACTIVE INGREDIENTS:

Permethrin*: 13.30%

OTHER INGREDIENTS**: 86.70%

Total..... 100.00%

*cis/trans isomers ratio: min. 35% (±) cis and max. 65 % (±) trans.

** Contains petroleum distillates

Pramex is a registered trademark of AgrEvo Environmental Health, Inc.

EPA Reg. No. 270-321

EPA Est. No. XXX-XXX

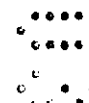
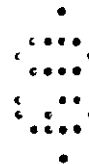
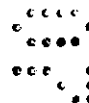
Net Contents: XX

KEEP OUT OF REACH OF CHILDREN
DANGER

ACCEPTED
with COMMENTS
In EPA Letter Dated
DEC 4 2003

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

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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.
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. • Do not give anything by mouth to an unconscious person.
<p>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</p>	
<p>Have the product container or label with you when calling a poison control center or doctor, or going for treatment.</p>	
<p>Note to Physician: This product contains a pyrethroid and a petroleum solvent. The possibility of aspiration pneumonia must be considered. The product is caustic and probable mucosal damage may contraindicate gastric lavage. Do NOT administer whole milk, cream or other substances containing vegetable or animal fats which enhance absorption of lipophilic substances.</p>	

See Side Panel for Additional Precautions

PRECAUTIONARY STATEMENTS
 HAZARDS TO HUMANS & DOMESTIC ANIMALS
 DANGER

Corrosive. Causes irreversible eye damage. Do not in eyes or on clothing. Wear safety glasses. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Wash thoroughly with soap and water after handling.



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Remove contaminated clothing and wash clothing before reuse. Do not use in food handling areas.

Environmental Hazards

This product is extremely toxic to fish. Do not apply directly to water. Do not contaminate water when disposing of equipment or disposal of wastes. Do not apply directly to water. Apply this product only as specified on this label.

Physical & Chemical Hazards

Do not use or store near heat or open flame. Flashpoint minimum of 105°F (41°C).

Directions for Use

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

Not for use on plants being grown for sale or other commercial use, or for commercial seed production or for research purposes. For use on plants intended for aesthetic purposes or ornamental gardens or parks or lawns and grounds.

For use on ornamental plants, mix Pramex H&G with water in the following manner:

Pramex H & G*
1 teaspoon (5 ml)

Water
1 gallon (3.79 L)

Note: Do not use more Pramex H & G than recommended, as this may cause some plant injury. Use this dilution unless other instructions are given.

Contact and Residual Spray: Apply a finished spray of Pramex H&G. Use sufficient spray to obtain full coverage of all foliage. Adjust spray volume used to plant size.

Houseplants: to protect plants in indoor landscaping, spray directly on insects to kill leafrollers, armyworms, cutworms, cabbage worms on chrysanthemums, fungus gnats on velvet plants. Spray as directed above to control aphids, armyworms, corn earworms, fall cankerworms, inchworms, Japanese beetles, leafminers, leafrollers, mealybugs, scales, spider mites, spring cankerworms, exposed thrips and whiteflies on the following plants:

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Ageratum	English Ivy	Poinsettia
Ardisia	Fuchsia	Portulaca
Aster	Gladiolus	Pothos
Azalea	Grape Ivy	Prayer Plant
Baby's Breath	Hypoestes	Purple Passion
Begonia	Ivy	Rabbits foot Fern
Birds-nest fern	Juniper	Rose
Bleeding heart	Lily	Schefflera
Carnation	Marigold	Snapdragon
Chrysanthemum	Orchid	Snake Plant
Coleus	Palm	Statice
Crown of Thorns	Pansy	Velvet Plant
Cockscomb	Piperomia	Verbena
Cyclamen	Petunia	Zinnia
Dracaena	Philodendron	
Dumbcane	Piggy-back plant	

Remove infested plants from living areas prior to application. Spray plants outside in an area not likely to be occupied by children or pets (particularly fish). When leaves dry, plants can be returned to original location.

Use with care on ferns, palms and fuchsia. As with all plants listed above, especially carnations, chrysanthemums, and roses, there exists a wide variety of species and cultivars and therefore, a wide variety of susceptibility to injury. To ascertain possible phytotoxicity, spray a few plants as described above, wait 24 hours and check for possible injury.

Repeat application may be necessary to control citrus blackflies on non-bearing citrus; adult Japanese beetles on roses.

Outdoor Ornamentals: Use 1 teaspoon of Pramex H & G in one gallon of water.

Contact and Residual Spray - Apply a finished spray of Pramex H & G. Use sufficient spray to obtain full coverage of all foliage. Adjust spray volume used to plant size. Spray in the late afternoon or evening when the temperature ranges from 50° to 75° and when there is little or no wind.

Spray at the first indication of insect pests. On those plants that will flower during the season, the spray schedule should be completed before blossom

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formation. Repeat as necessary; use intervals of 4 to 8 days. Pramex H & G application can be made up to the day of collection.

Spray as directed above to control aphids, cicadas, corn earworms, fall cankerworms, inchworms, leafminers, leafrollers, mealybugs, bagworms, spider mites, exposed thrips and whiteflies on the following plants:

Ageratum	Gladiolus	Pea Shrub
Arizona Cypress	Gold Bells	Petunia
Aster	Hypoestes	Philodendron
Azalea	Ivy	Poinsettia
Begonia	Lilac	Rhododendron
Coleus	Marigold	Rose
Common ninebark	Mock Orange	Snapdragon
Common Snowberry	Nannyberry	Taxus
Elm	Orchid	Wax Plants
Exacum	Palm	Weeping Fig
Euonymous	Pansy	Zinnia
English Ivy		

FOR ORNAMENTAL TREES GROWN AROUND THE HOME: Use sufficient spray to obtain full coverage of all foliage. Avoid heavy wetting. Use to control: pine moths, pine needle miners, pine beetles and needle scales on pine; budworms on conifers; oakworms on oak; fall webworms on cherry, elm and honeysuckle; aphids on tulip poplar; citrus black flies on non-bearing citrus; tussock moths on Douglas and grand firs; leafminers on birch; elm leaf beetle and elm spanworms on elms.

TO KILL TENT CATERPILLARS: Application should be made when caterpillars are young and tents are first noticed. For best results, apply in the late afternoon or evening when caterpillars have returned to their tents. Mix 2.5 fl oz (59 ml) of this product in one gallon (3.79 L) of water. Wet tents with spray on all sides. A few caterpillars may be seen escaping from the tent; however, they should die within several hours.

CLUSTER FLIES: Apply this product undiluted to the outside surfaces of buildings at the rate of 2.5 fl oz/1000 sq ft (74 ml/93m²). Use apparatus which delivers a strong mist spray of small particle size. Hold nozzle about three feet

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(or 1 meter) from surface to be treated. Apply when wind velocity is less than 2 mph (3.2 kph) to avoid drift.

TICKS (Lone Star, Bear, Black Legged), **FLEAS**, **CRICKETS** and **EARWIGS**: For treatment of localized infestations of these insects in outdoor areas where there are weeds or bushy non-crop areas, mix 1-1/3 ounces of Pramex H&G in 1 quart of water (or 5-1/3 ounces per gallon) and spray infested areas thoroughly.

FOR USE ON LAWNS

For control of ants (including fire ants, armyworms, chinch bugs, crickets, cutworms, Japanese beetle grubs, grasshoppers, mole crickets and sod webworms, consult the following chart:

PESTS	DILUTION
Armyworms Cutworms Chinch bugs Japanese beetle grubs Mole crickets Sod webworm	5 tsp/10 gal water/1000 ft ² (25 ml/38 L water/93m ²)
Crickets Grasshoppers Ants (including Fire Ants)	2 tsp/3 gal Water/100 ft ² (10 ml/11.4 L water/93m ²)

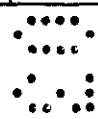
Lawns should be no taller than 3 inches (7.6 cm.) at time of application. Slightly more water may be used as long as the amount of product per area is as listed above. For heavy infestations, repeat application after two weeks.

Also for control of cutworms on dichondra and Irish moss. Use as directed above for lawns.

DIRECTIONS FOR USE OF PRAMEX H&G FOR GROUND APPLICATION ON VEGETABLES (For Backyard Vegetable Gardens only): Prepare Pramex H&G as directed on following chart. Use 0.25 gallon (1 quart) of finished spray per .110 square feet or one liter per 10.7 square meters of surface area.

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Vegetable	Target Pests	Remarks	Recommended Pramex H&G Dilution Use Rate Finished Spray	
			Tsp/gal	ML/liter
Asparagus, preharvest	Cutworms, Asparagus beetles	Apply for uniform coverage as needed. Do not apply more than 4 applications per crop. Can be applied up to 3 days prior to harvest.	4 tsp/5gal	1
Asparagus, postharvest	Larval stages of Asparagus beetles, Tarnished Plant Bugs, Lygus Bugs, and adult Japanese Beetles	Treat ferns or bush growth after spear harvest when insects are present	4 tsp/5gal	1
Celery	Vegetable Leaf Mines, Cabbage Loopers, Black and Granulate Cutworms, Fall, Beet and Southern Armyworms	Apply every 3-5 days or as needed. Can be applied up to 3 days prior to harvest. Do not make more than 10 applications per season.	1.5 tsp/1 gal	2
Cole Crops: Broccoli, Brussel Sprouts, Cabbage, Cauliflower	Beet Armyworms, Diamond Back Moths, Imported cabbageworms, Cabbage aphids, Cabbage Loopers	Apply every 5 days or as needed. Can be applied up to one day prior to harvest. Do not make more than 8 applications on Cauliflower, Brussel Sprouts and Broccoli and 10 applications on Cabbage	4 tsp/5 gal	1
Eggplant	Colorado Potato Beetles, Vegetable Leaf Miners	Apply for uniform coverage as needed. Do not exceed 16 applications. Can be applied up to 3 days prior to harvest.	1.5 tsp/1 gal	2
Horseradish (spring pre-plant dip)	Imported Crucifer Weevils	Soak sets for 30 minutes in 0.1% solution and air dry before planting.	6.5 tsp/1 gal	8.4



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Horseradish (foliar application)	Imported Crucifer Weevils	Apply as needed. Do not exceed 3 foliar applications. Can be applied up to 22 days prior to harvest.	1.5 tsp/1 gal	2
Head Lettuce only (Do not use on leaf lettuce)	Cabbage Loopers, alfalfa Loopers, Beet Armyworms, Corn Ear worms, Tobacco Budworms	Apply every 5 - 10 days as needed. Do not make more than 10 applications per season. Can be applied up to 1 day prior to harvest.	1.5 tsp/1 gal	2
Potatoes	Beet Armyworms, Colorado Potato Beetles, Potato Leafhoppers, Potato Flea Beetles, Aster Leafhoppers, Potato Aphids, Potato Tuberworms, Cabbage Loopers, Cutworms, European Corn Borers, Potato Psyllid, Tarnished Plant Bugs	Apply as needed. Do not apply more than 12 applications. Can be applied up to 7 day prior to harvest.	1.5 tsp/1 gal	2
Peppers	Vegetable Leafminers, Cabbage Loopers, Flea Beetles, Corn Earworms, Pepper Weevils, European Corn Borers	Apply as needed, but not more than 8 sprays per season. Can be applied up to 3 days prior to harvest.	1.5 tsp/1 gal	2
Spinach	Beet Armyworms, Corn Earworms, Cabbage Loopers, Cutworms, European Corn Borers, Green Cloverworms and Leafhoppers	Apply for uniform coverage when needed but not more than 7 applications per season. Can be applied up to 7 days prior to harvest.	4 tsp/5 gal	1
Sweet Corn	Corn Earworms, European Corn Borers, Fall Armyworms, Southern Armyworms	Apply every 5 days and when needed but not more than 6 applications per season. Can be applied up to date of harvest.	1.5 tsp/1 gal	2

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Tomatoes (Do not apply on cherry tomatoes and varieties yielding tomatoes less than one inch in diameter.)	Beet and Southern Armyworms, Tomato Pinworms, Tomato Fruitworms, Horn Worms, Granulate Cutworms, Colorado Potato Beetles, Cabbage Loopers	Apply for uniform coverage when needed but not more than 6 applications per season. Can be applied up to date of harvest.	1.5 tsp/1 gal	2
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DIRECTIONS FOR HOMEOWNER - BACKYARD USE OF Pramex H&G FOR TREE FRUIT AND NUT CROPS GROWN AROUND THE HOME. (For Ground Application Only)

Apply finished spray to trees until foliage is dripping wet. Application rate is based on dwarf and semi-dwarf sized fruit trees requiring 130 gallons/acre to runoff.

Trees (Fruit or Nut)	Target Pest(s)	Remarks	Recommended Pramex H&G Dilution Finished Spray	
			Tsp/gal	ml/liter
Almonds	Navel Orange Worms, Peach Twig Borers	Apply when insects appear. Do not make more than 2 applications during hull split and 5 applications per season. Can be applied up to 7 days prior to harvest.	2.2 tsp/1 gal	3
Apples	Plum Curculio, Redbanded Leafrollers, Rosyapple Aphids, Spotted Tentiform Leafminers, Tarnished Plant Bugs, White Apple Leafhoppers, Obliquebanded leafrollers, Green Fruitworms	Apply when insects appear. Repeat as required to maintain control. Do not make more than 3 applications per season. Do not apply after petal fall.	2.2 tsp/1 gal	3
Peaches	Lesser Peachtree Borers, Peach Twig Borers, Plum Curculio, Tarnished Plant Bugs, Green Fruitworms, Oriental Fruit Moths	Apply when insects appear. Do not make more than 8 applications per season. Do not apply within 7 days of harvest.	2.2 tsp/1 gal	3

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Pears (dormant through delayed dormant)	Pear Psylla	Apply during the dormant through delayed dormant growth period only. Add if desired, 8 oz of spray oil to each gallon of Pramex H & G diluted spray. Do not make more than 2 applications per season.	2.2 tsp/1 gal	3
Pears (summer)	Pear Psylla, Green Fruitworms, and Codling Moths	Apply when needed. Do not apply more than 3 applications per season. Can be applied up to 14 days prior to harvest.	2.2 tsp/1 gal	3

NOTICE: Buyer assumes all responsibility for safety and use not in accordance with directions.

STORAGE AND DISPOSAL

STORAGE: Store in a cool, dry area. Do not contaminate water, food or feed by storage or disposal. **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.

