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U.S. ENVIRONMENTAL PROTECTION AGENCY Office of Pesticide Programs Registration Division (7505C) 1200 Pennsylvania Ave., N.W. Washington, D.C. 20460 EPA Reg. Number: 11715-362

Date of Issuance:

FEB 10 2006

NOTICE OF PESTICIDE:

<u>x</u> Registration
Reregistration

(under FIFRA, as amended)

Term of Issuance:

Conditional- Registration until March 1, 2006

Name of Pesticide Product:

Etofenprox IGR Home and Carpet Spray1²

Name and Address of Registrant (include ZIP Code):

Speer Products, Inc. 4242 B.F. Goodrich Blvd. Memphis, TN 38181 38 118

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA sec. 3(c)(7)(A) provided that you:

- 1. Submit and/or cite all data required for registration/ reregistration of your product when the Agency requires all registrants of similar products to submit data; and submit acceptable responses required for reregistration of your product under FIFRA section 4.
- 2. Submit the results of a properly performed oxidation-reduction study per 830.6314. Please refer to the enclosed product chemistry review dated December 28, 2005 for details regarding the deficiencies of the previously submitted data.
- 3. Submit a revised Basic CSF correcting the minor mathematical errors detailed in the enclosed product chemistry review dated February 9, 2006.
- 4. You have applied for the registration of a product containing the active ingredient etofenprox. The Agency has conditioned the original registration of which you are a follow-on with conditional data requirements including an expiration date. This

Signature of Approving Official:	Date:

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4. (Continued)

registration will also be approved under the same conditions and expiration date. Accordingly, you must take steps to ensure that these required data are submitted. These steps could include generating and submitting the data yourself, or you may offer to share with other registrants the cost of conducting testing.

The data requirements being imposed on this registration are as follows:

Title of Study	Guideline Reference Number	Date Due
Residential "Indoor Surface Residue Dissipation Study following Total Release Product Use"	875.2300	September 1, 2003
Residential "Indoor Air Concentration Measurements following Total Release Product Use"	875.2500	September 1, 2003
Product Performance Data for cockroaches, fleas, ticks, and mosquitoes	810.3500 810.3400	September 1, 2002

The basic registrant has submitted this data and the Agency anticipates completing review before the expiration date. You will be notified of any changes in labeling as a result of this review.

- 5. Make the labeling changes listed below before you release the product for shipment:
 - a. Add the phrase "EPA Registration No. 11715-362".
 - b. In the ingredients statement, align all the decimal points. Also, two of the ingredients have asterisks after their name but there are no footnotes to which these asterisks refer.
 - c. Based on the toxicity profile for this product you may delete the If Inhaled, If in Eyes and If Swallowed first aid statements. Likewise revise the Hazards to Humans and Domestic Animals section to read, "Repeated exposure to Etofenprox can cause skin irritation." Avoid contact with skin or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco.
 - d. Move the statements beginning "Do not allow children or pets...etc. and ending... Exposed food should be covered or removed." to the Directions for Use section.
 - e. On the front panel add: "For Use Indoors at Residential Sites Only."
 - f. Under Directions for Use replace "eliminate" with "control".

- g. On front panel delete "photo stable". No information or data was submitted to support such a claim.
- 6. Submit three (3) copies of your final printed labeling before you release the product for shipment.

If these conditions are 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 these conditions.

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

Enclosure

ETOFENPROX IGR HOME AND CARPET SPRAY I2

A PHOTOSTABLE RESIDUAL PRODUCT FOR CONTROL OF FLEAS AND TICKS with NYLAR Insect Growth Regulator

Economical Do-It-Yourself Pest Control

No Oily Residue - No Unpleasant Odor

Also kills ticks, roaches, ants, spiders, lice, crickets, centipedes, waterbugs, silverfish and sowbugs.

Breaks the flea cycle and controls reinfestation for up to 210 days

Kills fleas, ticks, flea eggs, and flea larvae

Water Based

One Ounce Covers 50 Square Feet (16 oz. covers 800 sq. ft.)(32 oz. covers 1600 sq. ft.)

ACTIVE INGREDIENTS:

Etofenprox	1.00%
Etoc	
N-Octyl Bicycloheptene Dicarboximide	
Nylar	
OTHER INGREDIENTS:	98.18%

ACCEPTED
with COMMENTS
In EPA Letter Dated:

FEB 10 2006

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

Keep Out of Reach of Children

CAUTION

See Back Panel for Additional Precautions

Net Wt.	07 (ams.
NEL VVI.	UZ. (uns.

EPA Reg. No. 11715- Not yet assigned EPA Est. No. 11715-TN-1

Manufactured by SPEER PRODUCTS 4242 B. F. Goodrich Blvd. MEMPHIS, TN 38118

[END FRONT PANEL]

ISTART BACK / SIDE PANEL

ETOFENPROX IGR HOME AND CARPET SPRAY I2 kills adult and pre-adult fleas. It contains an Insect Growth Regulator (IGR) along with other ingredients to kill the adult fleas and prevent pre-adult fleas from developing into biting adults. Reaches the hiding places of the fleat rugs, carpets, drapes, pet bedding. upholstery and furniture. Protects the household from a buildup of fleas and reinfestation. One treatment protects for 210 days.

ETOFENPROX IGR HOME AND CARPET SPRAY I2 kills fleas, ticks, roaches, ants, waterburgs. silverfish, crickets, spiders, sowbugs, and carpet beetles.

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Do not allow children or pets to contact treated surfaces until spray has dried. Remove pets, birds, and cover fish aquariums before spraying. All food processing surfaces and utensils should be covered during treatment or wash thoroughly before reuse. Exposed food should be covered or removed.

	FIRST AID
If inhaled	 Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferable mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.
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 further 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.
lf 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. Do not give anything bymouth to an unconscious person.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not apply directly to water. Do not contaminate water when disposing of equipment washwaters.

PHYSICAL AND CHEMICAL HAZARDS

Contents under pressure. Do not use or store near heat or open flame. Do not puncture or incinerate, Exposure to temperatures above 130°F may cause bursting. Use adequate ventilation during use. Do not smoke while using this product. Do not use this product in or on electrical equipment due to the possibility of shock hazard. Do not allow product to freeze.

DIRECTIONS FOR USE

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

READ THE ENTIRE LABEL PRIOR TO USE. USE STRICTLY IN ACCORDANCE WITH ALL LABEL PRECAUTIONS AND DIRECTIONS.

Remove all exposed food and cooking utensils. Cover all food handling surfaces and wash thoroughly after treatment and before use. Do not use on edible crops.

SHAKE WELL BEFORE USE

Remove pets, birds and cover fish aquariums before spraying. Do not allow children or pets to contact surface until spray has dried.

Indoors: Thoroughly vacuum all carpeting, upholstered furniture, along baseboards, under furniture and in closets. Seal vacuum bag and dispose of in trash outdoors.

Spray Etofenprox IGR Home and Carpet Spray I² from 2 feet to 3 feet away from surface being treated. Apply with a smooth back-and-forth motion to carpets, drapes, rugs, and upholstered furniture. Avoid wetting or saturating of carpets or furniture. A fine mist spray that is evenly applied will do the job properly. Do not spray wood furniture, floors or trim as water spotting may occur. Repeat treatment every 14 days to eliminate adult fleas and ticks.

Apply directly to exposed insects - roaches, ants, spiders, crickets, waterbugs, silverfish, sowbugs, and carpet beetles: Spray areas where these pests are found or may hide, including dark corners of rooms and closets, cracks and crevices, along baseboards and door sills and frames, behind sinks, stoves, refrigerators, and cabinets and around garbage cans, plumbing and other utility installations. Pests driven out of hiding places should be sprayed directly. Spray ant trails, nests and points of entry. Repeat treatment every 14 days.

On Pet Bedding: Treat pet bedding and resting places. Apply a uniform application of Etofenprox IGR Home and Carpet Spray I² to nearby cracks and crevices, along and behind baseboards, window and door sills, and localized areas of floors where fleas or ticks may be present as these are primary hiding places for fleas. Pet bedding does not need to be removed after treatment.

Repeat treatments to infested areas as necessary at intervals of 14 days or greater. Do not make more than 6 applications per site per year.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or 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.

Buyer assumes all risks of use, storage or handling of this material not in strict accordance with directs given herewith.