



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

APR 7 2003

Mr. Bill Washburn
Speer Products, Inc.
P.O. Box 18993
Memphis, TN 38118-0993

Subject: Amendment Revising First Aid and Disposal Per PR Notices 2001-1 and 2001-6
Elite Lawn Spray Concentrate 4#
EPA Registration Number: 68688-36
Your Submission Dated January 21, 2003

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 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. Delete the following statements from the HAZARDS TO HUMANS AND DOMESTIC ANIMALS section: "Contains petroleum distillate. Do not induce vomiting because of aspiration pneumonia hazard." **and** "In case of contact flush with plenty of water. Obtain medical attention if irritation persists."

These statements are redundant, incomplete or in conflict with the recommendations in the FIRST AID section.

2. Add the following inhalation first aid statements to the First Aid section, since the Precautionary Statements indicate that the product is "Harmful if inhaled":

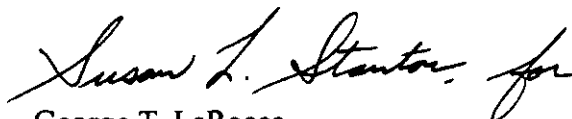
If inhaled:	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. • Call a poison control center or doctor for further treatment advice.
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275

-2-

If you have any questions regarding this action, please contact Susan Stanton of my team at (703) 305-5218.

Sincerely,

A handwritten signature in cursive script that reads "Susan L. Stanton for".

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

Enclosure

ELITE LAWN SPRAY CONCENTRATE 4#

KILLS FLEAS AND TICKS ON LAWN

Emulsifiable concentrate for use on residential lawns and around residential premises only to kill fleas and ticks and other outdoor insects listed on this label.

Also kills deer ticks and other ixodid species that carry and transmit lyme disease.

Also controls Cockroaches, Palmetto Bugs, Ants, Crickets, Sowbugs (Pillbugs), Centipedes, Ticks, and Spiders

ACTIVE INGREDIENT:

(S)-cyano(3-phenoxyphenyl)methyl-
(s)-4-chloro-alpha-(1-methylethyl)
benzeneacetate.....0.44%

INERT INGREDIENTS:.....99.56%

TOTAL 100.00 %

* Contains Petroleum Distillate

KEEP OUT OF REACH OF CHILDREN

CAUTION

See Side Panel for Additional Precautionary Statements

NET CONTENTS _____ OZ.

EPA Reg. No. 68688-36
EPA Est. No. 11715-TN-1

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND
DOMESTIC ANIMALS
CAUTION**

Harmful if absorbed through skin or inhaled. Causes moderate eye irritation. Harmful if swallowed. Contains petroleum distillate. Do not induce vomiting because of aspiration pneumonia hazard. Avoid breathing vapor or spray mist and contact with skin, eyes, or clothing. In case of contact, flush with plenty of water. Obtain medical attention if irritation persists. Remove contaminated clothing and wash before reuse. Wash thoroughly with soap and water after handling. Avoid contamination of food or feed.

Do not spray plants used for food or feed.

FIRST AID	
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.

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

APR 7 2003

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

68688-36

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.

IF SWALLOWED:

- Immediately call a poison control center or doctor.
- Do not induce vomiting unless told to do so by a poison control center or doctor.
- Do not give any liquid to the person. Do not give anything by mouth to an unconscious person.

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.

NOTE TO PHYSICIAN

Contains petroleum distillate--vomiting may cause aspiration pneumonia.

385

PHYSICAL OR CHEMICAL HAZARDS

Do not use or store near heat or open flame.

ENVIRONMENTAL HAZARDS

This pesticide is extremely toxic to fish and aquatic invertebrates. Do not apply directly to water. Drift from treated areas may be hazardous to organisms in adjacent aquatic sites. Do not contaminate water when disposing of equipment washwaters.

DIRECTIONS FOR USE

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

LAWN FLEA CONTROL: To kill fleas harboring in residential lawns use this concentrate in a hose-end sprayer. Place required amount of concentrate in sprayer jar (see chart below) & fill with water to the recommended level. Mix well. Attach to sprayer and spray as recommended. For best results, lawn should be mowed a day or two before spraying. Spray using a slow, even sweeping motion, being sure to cover the entire lawn surface where the pets will normally frequent. Spray under ornamentals and trees, but avoid soaking young or flowering plants. Repeat treatments may be necessary at 7 to 14 day intervals.

Kills on contact the Ixodes dammini tick (deer tick), which transmits lyme disease. Also kills foraging fire ants upon direct contact. A registered fire and mound treatment should also be used in conjunction with this product. Keep pets and children out of the treated area until after the spray has dried.

Do not spray animals. Dogs, cats, their kennel or bedding area should also be treated with a registered flea control product in conjunction with this application.

AMOUNT OF PROD. TO USE FLUID OUNCES*	AMOUNT OF WATER TO USE	AREA TO BE TREATED
1 1/3	3 Gals.	500 Sq. Ft. (50' x 10')
2 2/3	6 Gals.	1000 Sq. Ft. (50' x 20')
4	9 Gals.	1500 Sq. Ft. (50' x 30')
5 1/3	12 Gals.	2000 Sq. Ft. (50' x 40')
8	18 Gals.	3000 Sq. Ft. (50' x 60')
16	36 Gals.	6000 Sq. Ft. (50' x 120')

*NOTE: 1 Fluid Ounce = 2 Tablespoonsful = 6 Teaspoonsful

FOR OUTDOOR PESTS: Mix concentrate in a compressed air sprayer or watering can at the rate of two (2) fluid ounces per one (1) gallon of water to control on contact, **cockroaches, palmetto bugs, ants, crickets, sowbugs, spiders, and ticks.** Use at the rate of one (1) gallon (diluted spray) per 1000 square feet to outside surfaces of buildings, porches, patios, garages and other areas where these pests have been seen or are found. Do not spray in or near fish ponds or other bodies of water. Do not allow spray to contact ornamental plants or shrubs because of possible injury.

BUILDING PERIMETER TREATMENT: To help prevent infestations of buildings by **ants, crickets, spiders, centipedes, and sowbugs (pillbugs):** Treat a 12-18 inch band of soil or other substrate adjacent to buildings and the building foundation to a height of 2 to 3 feet where these pests are active and may find entrance. Use eight (8) fluid ounces of concentrate per gallon of water and apply as a coarse wet spray at the rate of one (1) gallon

per 1,000 square feet.

STORAGE AND DISPOSAL

DO NOT CONTAMINATE WATER, FOOD OR FEED BY STORAGE OR DISPOSAL STORAGE; Store in a cool, dry place. Keep container closed.

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 emergency or for product use information call (901) 362-1950, Monday - Friday, 7:30 AM - 4:30 PM, CST.

(Distributors may elect to use their own phone numbers and time of operation)

**MANUFACTURED BY:
SPEER PRODUCTS, INC.
P.O. BOX 18993
MEMPHIS, TN 38181-0993**

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FOR USE WITH HOSE END SPRAYER CAP

The hose end sprayer cap is calibrated to deliver the correct dilution rate. No mixing – no measuring – no mess. Screw hose into back of sprayer cap. Remove bottle cap (save for storage after use). Secure sprayer cap by turning bottle counter-clockwise. Turn on water supply. TO START FLOW OF INSECTICIDE, place index finger over hole on right side of sprayer cap. Spray evenly and completely over lawns and other infested areas, giving special attention to areas frequented by pets. Hold about three feet above surface, moving at a steady pace to insure consistent, thorough coverage. When treatment is complete, or you wish TO STOP FLOW OF INSECTICIDE for any reason, simply remove finger from hole to break siphon actions. TO STORE REMAINING INSECTICIDE, turn off water supply and remove bottle from sprayer unit and hose by turning bottle clockwise. Replace cap on bottle and tighten securely. Unscrew hose from sprayer unit and rinse unit in clear water. Store in cool place.

