

NOV 12 1991

Martine Albritton
S C Johnson & Son, Inc.
1525 Howe Street
Racine, WI 53403

Dear Ms. Albritton:

Subject: Response to PR Notice 91-4 - DEET LIP
Maximum Strength Deep Woods Off!
EPA Reg. No. 4822-215
Maximum Strength Deep Woods OFF! II
EPA Reg. No. 4822-216
Maximum Strength Pump Spray Deep Woods Off!
EPA Reg. No. 4822-276
Submissions: October 30, 1991

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. Five copies of the finished labeling must be submitted prior to releasing the product for shipment.

- 1) Enclosed is a review done on #4822-215. In addition, we have other reviews on 100% DEET products that indicate the signal word should be "WARNING" rather than CAUTION. Please change the signal word to WARNING for all products identified above.
- 2) Change the Precautionary statements to read "HAZARDS TO HUMANS - WARNING: May cause eye injury. Harmful if swallowed." Keep remainder of those sections as given.
- 3) The statement "For deer flies, reapply every 3 hours" appears to be inconsistent with the PR Notice. Please review your data and either eliminate or revise this statement if reapplying every 3 hours increases exposure without sufficient need. (For product #4822-215)
- 4) Add the phrase "Use just enough repellent to cover exposed skin".

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- 5) We note the addition of the sentence "Do not keep product on any longer then necessary". We believe this statement only partially complies with the intent of PR Notice 91-4. Add the phrase "After returning indoors, wash treated skin with soap and water".
- 6) For EPA Reg. No. 4822-216, use the full name of the product wherever it appears in the labeling - Deep Woods OFF II

We note that you have labeled these DEET products FLAMMABLE. This does not appear to be consistent with the reported flammability results for this ingredient. Please check your data. If there are other factors influencing this labeling issue, they should be brought to our attention. If not, the reference to FLAMMABLE should be removed.

Sincerely,



Richard F. Mountfort
Product Manager 10
Insecticide & Rodenticide Branch
Registration Division (H7505C)

RSE

Johnson Wax
MAXIMUM STRENGTH
DEEP WOODS
OFF!

FLY & MOSQUITO
REPELLENT LOTION

ACCEPTED
with COMMENTS
in EPA Letter Dated

NOV 12 1991

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
4822-216

For the Toughest Biting
Fly and Mosquito
Problems

Provides up to 10 hours
of protection from
mosquitoes, gnats and
biting flies: deer flies,
sand flies, stable flies,
black flies. Also repels
ticks, chiggers and fleas
from treated skin.

ACTIVE INGREDIENTS:

N,N-diethyl-meta-toluamide	94.50%
Other isomers	5.00%
INERT INGREDIENTS	0.50%

KEEP OUT OF REACH OF CHILDREN

CAUTION

(See additional precautions on back panel)

NET WT. 1 to 12 OZ.

**MAXIMUM STRENGTH DEEP WOODS OFF II
Fly & Mosquito Repellent Edition**

Maximum Strength Deep Woods Off! Lotion is made to protect you from the toughest biting fly and mosquito problems. This formula provides up to 10 hours of protection from mosquitoes, gnats and biting flies; deer flies, sand flies, stable flies, black flies. Also repels ticks, chiggers and fleas from treated skin.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS - CAUTION: Harmful if swallowed. Causes eye irritation. Avoid contact with eyes and lips. To apply to face, spray palm of hand and rub on. Do not apply to excessively sunburned or damaged skin. Use sparingly on small children. Do not allow use by small children without close adult supervision. May cause skin reaction in rare cases.

STATEMENT OF PRACTICAL TREATMENT: If in eyes - flush with plenty of water. If irritation persists, get medical attention. If swallowed - call a physician or poison control center. Get medical attention. If you suspect that you or your child is reacting to this product, wash treated skin and call your doctor.

PHYSICAL & CHEMICAL HAZARDS - FLAMMABLE: Do not use near heat or open flames. Keep treated surfaces away from fire, sparks, or flame until dry.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. **Read all directions before using this product.**

Hold container upright 4 to 6 inches away from skin or clothing. Do not use as a space spray. Avoid overexposure. Frequent reapplication and saturation are unnecessary. **FOR MAXIMUM PROTECTION:** Spread evenly with hand to moisten all exposed skin.

TO APPLY TO FACE - Spray palm of hand and rub on. Do not apply to eyes and mouth and do not apply to the hands of young children.

BEST AVAILABLE COPY

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WORKS ON CLOTHING TOO: Do not apply under clothing. Spray shirts, pants, socks and hats. For ticks and chiggers also spray cuffs, socks and around openings in outer clothing. Will not damage cotton, wool and nylon. **DO NOT APPLY ON OR NEAR: ACETATE, RAYON, SPANDEX OR OTHER SYNTHETICS (OTHER THAN NYLON), FURNITURE, PLASTICS, WATCH CRYSTALS, LEATHER, AND PAINTED OR VARNISHED SURFACES INCLUDING AUTOMOBILES.** Wash treated clothing. Do not keep product on any longer than necessary.

STORAGE: Store away from heat or flame in an area inaccessible to children. **DISPOSAL:** Do not reuse empty container. Wrap container and put in trash.

Questions? Comments?
Call 800-558-5252
Weekdays. 9-5, Eastern Time
or Write Helen Johnson
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"OFF!" and "Deep Woods Off!" are S. C. Johnson & Son, Inc's trademark for insect repellent.

EPA Reg. No 4822-216
EPA Est. No. 4822-WI-2