

JUN 21 1990

PH 11 11 11 11

Watkins Incorporated  
150 Liberty Street  
Winona, MN 55987

**BEST AVAILABLE COPY**

Dear Lloyd Ferdinandsen

Subject: Watkins Insect Repellent - Formula 50  
EPA Reg. No. 99-123  
Application dated May 2, 1990

The proposed amendment to the registration of the product cited above under the Federal Insecticide Fungicide and Rodenticide Act removing the active ingredient, HGR R-11, and increasing the amount of another active ingredient is acceptable subject to the comments listed below. A stamped copy of the label is enclosed for your records.

- 1) Submit a revised Confidential Statement of Formula (CSF) showing the certified upper and lower limits for the active ingredients in pure active form and for the individually added inert ingredients.
- 2.) Change the precautionary labeling to read:  
  
Causes eye irritation. Harmful if swallowed. Avoid contact with eyes or lips. Do not let children rub their eyes if hands have been treated.
- 3.) Add the statement "See additional precautions on the back panel" to the front panel.
- 4.) Submit a 1 year storage stability study. The formulated product must be analyzed for its active ingredients at time zero and during a year of storage. The storage must be under warehouse conditions of temperature and humidity using containers similar to those that will be used in the trade. This data must be submitted within 15 months of the date of this letter.

58814:I:Tavano:CBI-02:KENCO:06/15/90:07/14/90:ka:sw:vo:dd:ka

CONCURRENCES

SYMBOL	H7505C						
SURNAME	Tavano						
DATE	6/18/90						

5.) Provide information on the corrosion characteristics of this product. This information can be noted during the storage stability study.

Sincerely yours,

Phil Hutton  
Product Manager (17)  
Insecticide-Rodenticide Branch  
Registration Division (H7505C)

BEST AVAILABLE COPY

**SPECIMEN LABEL**

Liquid Insect Repellent Spray made from MGK® Intermediate 2007

**Front Panel**

**WATKINS INSECT REPELLENT - FORMULA 50**

Repels Mosquitoes, Chiggers, Ticks, Deer Flies, Stable Flies, Black Flies, Gnats and Fleas on Exposed Skin Surfaces.

**ACTIVE INGREDIENTS:**

N,N-diethyl-m-toluamide.....	36.535%	✓
Other isomers.....	1.925%	✓
*N-Octyl bicycloheptene dicarboximide.....	7.690%	✓
**Di-n-propyl isocinchomeronate.....	3.850%	✓
<b>INERT INGREDIENTS.....</b>	<b>50.000%</b>	
	<b>100.000%</b>	

\*MGK® 264, Insecticide Synergist

\*\*MGK® Repellent 326

MGK®

- Registered trademark of McLaughlin Gormley King Co.

KEEP OUT OF REACH OF CHILDREN

**CAUTION**

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Call a physician or Poison Control Center immediately.

IF IN EYES: Flush with plenty of water. Get medical attention if irritation persists.

Net Contents 4 fl. oz.

EPA Reg. No. 99-123

WATKINS INCORPORATED  
WINONA, MN 55987

EPA Est. No.  
99-123-1

ACCEPTED  
WATKINS INCORPORATED  
WINONA, MN

JUN 21 1990

Label for this product  
is in compliance with the  
Federal Insecticide, Fungicide and  
Rodenticide Act of 1947  
and is registered under EPA Reg. No.

99-123

Back Panel

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Instruct older children in the proper use of this product. Do not spray on face, lips or into eyes. In case of contact with eyes, flush with water.

PHYSICAL OR CHEMICAL HAZARDS

FLAMMABLE. Keep away from heat or open flame.

DIRECTIONS FOR USE

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

To repel the listed insects, apply liberally to all exposed skin areas. To apply to face, spray into hands and rub on. Repeat as needed. For ticks and chiggers, also apply liberally to shoe tops, socks, and around openings in clothing.

Avoid contact with plastics, such as eyeglass frames, and such fabric as acetate rayon.

STORAGE AND DISPOSAL

STORAGE: Store in a cool dry area away from heat or open flame.

DISPOSAL: Securely wrap original container in several layers of newspaper and discard in trash. ✓