

MAR 22 2004

Rudolph Jackson
PIC Corporation
23 S. Essex Avenue
P.O. Box 543
Orange, NJ 07050

Subject: PIC X-100 DEET
EPA Registration No. 3095-27
Application September 27, 1999

Dear Mr. Jackson:

The proposed amendment to the registration for the product cited above under The Federal Insecticide, Fungicide And Rodenticide Act, as amended revising the label in response to the DEET RED is acceptable subject to the comments listed below:

1) Change the ingredients statement to read:

ACTIVE INGREDIENT
DEET.....98.11%
Other INGREDIENTS..... 1.89%

2) Change the Precautionary Statements to read as follows:

⌘ Causes substantial but temporary eye injury. Harmful if swallowed. Do not get in eyes. Use of this product may cause skin reactions in rare cases. Wash treated clothing before wearing it again. Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.⌘

3) Change the First Aid section to read:

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 five minutes, then continue rinsing.

- ⌘Apply sparingly around ears.⌘
- ⌘Do not apply over cuts, wounds or irritated skin.⌘
- ⌘Do not allow children to handle this product.⌘
- ⌘Do not apply to children's hands.⌘
- ⌘When using on children, apply to your own hands, and then put it on the child.⌘
- ⌘Use just enough repellent to cover exposed skin and/or clothing.⌘
- ⌘Do not use under clothing.⌘
- ⌘Avoid over-application of this product.⌘
- ⌘After returning indoors, wash treated skin with soap and water.⌘
- ⌘Do not spray in enclosed areas.⌘
- ⌘If used on the face, spray on hands first and then apply sparingly and avoid eyes. Do not spray directly onto face.⌘

7) Since this product no longer contains 100% Deet, the word, DEET, must be deleted from the product name. PIC X-100 would be acceptable.

This product is not being re-registered at this time. Product specific efficacy data will be required. Once the efficacy guidelines are in place, you will be notified of the efficacy requirements.

Also, to be eligible for re-registration, the product must be packaged in containers utilizing a concave trigger to help aim the product or other comparable mechanism that will ensure that the product will not be inadvertently sprayed in the eyes.

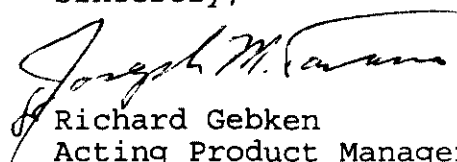
A stamped copy of the draft label is enclosed for your records. Submit two copies of the finished label revised in accordance with the comments listed above before the product is released for shipment under this amended label.

Submit a current updated Confidential Statement Of Formula (CSF) for this product.

Product specific efficacy data will be required. Once the efficacy guidelines are in place, you will be notified of the efficacy requirements.

If you have any questions or comments please contact Joseph Tavano at (703) 305-6411.

Sincerely,



Richard Gebken
Acting Product Manager 10
Insecticide Branch
Registration Division (7505C)



PIC

X-100 DEET

REPELS FOR HOURS AGAINST
Mosquitoes — Biting Flies — Deerflies
Ticks — Chiggers — Gnats

Active Ingredients:

N,N-diethyl-m-toluamide 95%
Other Isomers 5%

WARNING: Keep out of reach of Children
For external use only — Contains 1 fl. oz.
For other precautions: See attached card for
additional instructions and precautions
before using.

EPA Reg. No. 3095-27 Pic Corp.
EPA Est. No. 3095-NJ-1

It is a violation of Federal Law to use this pro-
duct in a manner inconsistent with its label.

ACCEPTED
with COMMENTS
In EPA Initial Review:

MAR 22 2004

Under the Federal Insecticide, Fungicide, and Rodenticide Act, this pesticide is registered under the name X-100 DEET, EPA Reg. No. 3095-27, EPA Est. No. 3095-NJ-1. For more information, contact the EPA Office of Pesticide Programs, 700 Capitol Mall, NE, Washington, DC 20548, or call 1-800-455-7267.

3095-27

Warning: Keep out of reach of Children and infants, instruct older Children in proper use of this product.

Directions For Use: Read All Directions Before Using This Product. Apply just enough Repellent to cover exposed skin or on clothing. Do not use under clothing — avoid over exposure — frequent reapplication and saturation is unnecessary for effectiveness. Do not apply: Over cuts, wounds, irritated skin — eyes or mouth and do not apply to hands of young Children or spray on face.

Precautionary Statement: Hazards to Human & Domestic Animals. May cause Eye injury. Harmful if swallowed.

Physical & Chemical Hazards: Avoid contact with Plastics such as Eyeglass Frames and such fabrics as Acetate Rayon.

Statement of Practical Treatment: If in Eyes: Flush with plenty of water. If irritation persists get medical treatment. If Inhaled: Call a physician or poison control center. Get medical attention.

Do not spray in enclosed areas.

After returning indoors — wash treated skin with soap & water, wash treated clothes.

Use of this product may cause skin reactions in rare cases. If you suspect that you or your child is reacting to this product, wash treated skin and call your local poison control center.

If you go to a doctor, take this repellent with you.

Storage and Disposal: Do not reuse empty container — wrap & dispose in trash collection. Store in cool dry area away from heat or open flame.