

the Federal Government.

5) Remove: "Guaranteed to work up to 10 hours"

There are no associated terms of the guarantee for this label.

b. Revise the Signal word and Keep Out of Reach of Children statement section as follows:

**"KEEP OUT OF REACH OF CHILDREN
WARNING**

Refer to back, or container label for additional precautionary statements"

The Signal Word is required to appear on the front panel of the label, directly below the Child Hazard Warning statement (Keep Out of Reach of Children). All required front panel warning statements shall be grouped together on the label, and shall appear with sufficient prominence relative to other front panel text and graphic material to assure that they will not be overlooked under customary conditions of purchase and use. PIC Corporation should also review Chapter 3, section VIII to determine the proper font size for these statements. The Label review manual can be found at the following Agency internet site:

<http://www.epa.gov/oppead1/labeling/lrm/>

2. Back Panel Card

a. Remove and or revise the following marketing claims:

1) Remove "Nothing More Effective!"

This is a false or misleading statement concerning the effectiveness of the product as a pesticide and a false or misleading comparison with other pesticides.

2) Remove: "Made In USA."

PIC Corporation should demonstrate that the source supply of the active ingredient is manufactured in the U.S.A.

3) Remove the web site reference from the label: "www.pic-corp.com"

The Agency does not review web sites for accuracy of information, and a reference to other information is considered collateral labeling.

b. Revise the Precautionary Statements section as follows:

"PRECAUTIONARY STATEMENTS:

Hazards to Humans & and Domestic Animals:

WARNING 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 toilet."

The cleaning instructions for clothing are being moved to the directions for use section.

c. Within the First Aid Box, remove the following statement:

IF YOU SUSPECT A REACTION TO THIS PRODUCT Discontinue use. Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a Poison Control Center for treatment advice."

There is no specific requirement within PR Notice 2001-1 for the insertion of this language within the First Aid Section. This language should be moved to the Directions for Use as discussed below.

d. Within the Directions for Use section, revise as follows:

1) Within the Directions for Use section, revise as follows:

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

READ AND FOLLOW ALL DIRECTIONS AND PRECAUTIONS ON THIS PRODUCT LABEL.

For Outdoor Use Only. Do not spray in enclosed areas. Never use

repellents over cuts, wounds, sunburned or irritated skin. Do not apply near eyes and mouth, and apply sparingly around ears. When using sprays, do not spray directly into face; spray on hands first and then apply to face. Do not allow children to handle this product, and do not apply to children's hands. When using on children, apply to your own hands and then put it on the child. Apply only to exposed skin and/or clothing (as directed on the product label). Do not use under clothing. Use just enough repellent to cover exposed skin. Heavy application and saturation is unnecessary for effectiveness; if biting insects do not respond to a thin film of repellent, apply a bit more. After returning indoors, wash treated skin with soap and water or bathe. This is particularly important when repellents are used repeatedly in a day or on consecutive days. Also, wash treated clothing before wearing it again. **Use of this product may cause skin reactions in rare cases. If you suspect a reaction to this product, discontinue use, wash treated skin, and call your local poison control center. If you go to a doctor, take this product with you.** Do not apply to synthetic fabrics such as acetate, rayon or spandex. May damage furniture finishes, leather, plastics, painted and varnished surfaces including watch crystals, and automobiles."

e. Revise the Storage and Disposal Section as follows:

"Storage and Disposal

Pesticide Storage: Store in a cool dry place away from heat or open flame and inaccessible to children.

Pesticide Disposal: 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."

3. Container label (Peel-out Label)

a. Front Panel section:

- 1) Revise "~~Repels for Hours Against~~ Mosquitoes, Biting Flies, Deerflies, Ticks, Chiggers & Gnats"

Usage of "for hours against" is a vague, false or misleading statement concerning the effectiveness of the product as a repellent.

- 2) Revise the Signal word and Keep Out of Reach of Children statement section as follows:

**"KEEP OUT OF REACH OF CHILDREN
WARNING**

For External Use Only

Refer to back, or container label for additional precautionary statements"

The Signal Word is required to appear on the front panel of the label, directly below the Child Hazard Warning statement (Keep Out of Reach of Children). All required front panel warning statements shall be grouped together on the label, and shall appear with sufficient prominence relative to other front panel text and graphic material to assure that they will not be overlooked under customary conditions of purchase and use. PIC Corporation should also review Chapter 3, section VIII to determine the proper font size for these statements. The Label Review Manual can be found at the following Agency internet site:

<http://www.epa.gov/oppfead1/labeling/lrm/>

- 3) EPA Reg. No. 3095-27 and EPA Est. No. 3095-NJ-1 should be

together and on separate lines. These are currently shown broken by margin constraints.

- 4) Revise the marketing claim as follows: ~~Repels for Hours Against Mosquitoes, Biting Flies, Deerflies, Ticks, Chiggers & Gnats~~
Usage of "for hours" is a vague, false or misleading statement concerning the effectiveness of the product as a repellent.

- 5) Revise The Active Ingredient statement from "Deet" to "DEET".

b. Back Panel section:

- 1) Remove from back panel: "Made in USA."
PIC Corporation should demonstrate that the source supply of the active ingredient is manufactured in the U.S.A.

c. Inside Panel section:

- 1) Revise the Precautionary Statement Section as follows:

"PRECAUTIONARY STATEMENTS:

Hazards to Humans & Domestic Animals

Warning: Causes substantial but temporary eye injury. Do not get in eyes. Harmful if swallowed. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco."

Refer to 2 b above for an explanation of the changes.

- 2) Revise the First Aid section as follows:

"FIRST AID

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: •Call 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 by mouth to an unconscious person.

If inhaled: •Move person to fresh air. •If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. •Call a poison control center or doctor for further treatment advice.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-255-1924 for emergency medical treatment information.

Note to Physician: Probably mucosal damage may contraindicate the use of gastric lavage."

Refer to 2 c above for an explanation of the changes.

- 3) Within the Directions for Use section, revise as follows:

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

READ AND FOLLOW ALL DIRECTIONS AND PRECAUTIONS ON THIS PRODUCT LABEL.

For Outdoor Use Only. Do not spray in enclosed areas. Never use repellents over cuts, wounds, sunburned or irritated skin. Do not apply near eyes and mouth, and apply sparingly around ears. When using sprays, do not spray directly into face; spray on hands first and then apply to face. Do not allow children to handle this product, and do not

apply to children's hands. When using on children, apply to your own hands and then put it on the child. Apply only to exposed skin and/or clothing (as directed on the product label). Do not use under clothing. Use just enough repellent to cover exposed skin. Heavy application and saturation is unnecessary for effectiveness; if biting insects do not respond to a thin film of repellent, apply a bit more. After returning indoors, wash treated skin with soap and water or bathe. This is particularly important when repellents are used repeatedly in a day or on consecutive days. Also, wash treated clothing before wearing it again. **Use of this product may cause skin reactions in rare cases. If you suspect a reaction to this product, discontinue use, wash treated skin, and call your local poison control center. If you go to a doctor, take this product with you.**

Do not apply to synthetic fabrics such as acetate, rayon or spandex. May damage furniture finishes, leather, plastics, painted and varnished surfaces including watch crystals, and automobiles."

4) Revise the Storage and Disposal Section as follows:

"Storage and Disposal

Pesticide Storage: Store in a cool dry place away from heat or open flame and inaccessible to children.

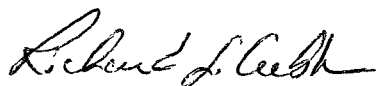
Pesticide Disposal: If empty: Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency or 1-800-CLEANUP for disposal instructions."

- 4. To be eligible for reregistration, aerosol and pump spray formulations must be packaged in containers utilizing a concave trigger to help aim product or other comparable mechanism that will ensure that the product will not be inadvertently sprayed in the eyes
- 5. The Agency is in the process of developing and improving the current Efficacy Assessment Guidelines for repellent products. The Agency intends to defer the determination of any related efficacy data requirements supporting the claims that may appear on this label until these Efficacy Assessment Guidelines are complete. When the guidelines are finalized, the Agency expects to issue a Data Call-In to address the revised guidelines to all registrants with registrations for personal repellent products that have not previously submitted efficacy data sufficiently consistent with the revised guidelines.

You must submit two copies of the final printed label revised in accordance with the comments listed above before the product is released for shipment under this label. If you have any questions, you may contact Carmen Rodia at (703)-306-0327 or rodia.carmen@epa.gov.

A copy of your label stamped "Accepted with Comments" is enclosed for your records.

Signature of Approving Official:



Richard J. Gebken, Product Manager (10)
Registration Division, Insecticide Branch

Date:

APR 02 2008

FRONT - CARD

6/8



MAXIMUM STRENGTH



Nothing More Effective!

X-100

Insect Repellent

For The True Outdoorsman

Mosquitoes, Ticks, Biting Flies, Gnats And Chiggers.

Non-Aerosol

Pump Spray

Repels For Hours Against Mosquitoes, Biting Flies, Deerflies, Ticks, Chiggers & Gnats

ACTIVE INGREDIENT
DEET 98.11%
Other Ingredients 1.89%



Guaranteed to repel up to 10 hours.



Used by military in jungles.



Fits in pocket.



Pump spray/economical/easy application.



Nothing more effective.

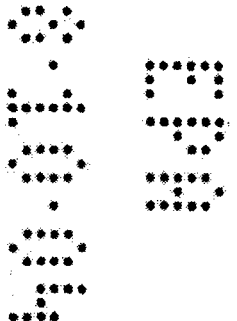
Warning: Keep out of reach of children, infants and domestic animals. Instruct older children in proper use of this product. Keep out of reach of domestic animals. For external use only.

ACCEPTED
with COMMENTS
In EPA Letter Dated

April 2, 2008
Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No.

3095-27

Made in USA.



Maximum Strength



Nothing More Effective!
X-100

Insect Repellent

For The True Outdoorsman

Mosquitoes, Ticks, Biting Flies, Gnats And Chiggers.

Non-Aerosol

Pump Spray

PRECAUTIONARY STATEMENT:
Hazardous to human & domestic animals—CAUTION 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 toilet.


FIRST AID:
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 continuing rinsing eye.
Call a Poison Control Center or Doctor for treatment advice.
IF 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 by mouth to an unconscious person.
IF INHALED: 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 treatment advice.
IF YOU SUSPECT A REACTION TO THIS PRODUCT: Discontinue use. Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a Poison Control Center for treatment advice.

NOT LIST NUMBER IN CASE OF EMERGENCY CALL TOLL FREE 1-800-255-3924. Have the product container or label with you when calling a Poison Control center or Doctor or going for treatment.

NOT TO PHYSICIAN: Possible mucous damage may contraindicate the use of gastric lavage.
DIRECTIONS FOR USE: It is a violation of Federal Law to use this product in a manner inconsistent with the labeling.
READ AND FOLLOW ALL DIRECTIONS AND PRECAUTIONS ON THIS PRODUCT LABEL.

GENERAL PRECAUTIONS AND RESTRICTIONS: Do not apply over eyes and mouth. 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 directly to face.

STORAGE AND DISPOSAL STATEMENTS: Do not contaminate water, food or feed by storage and disposal. **PERSISTENCE:** Store in a cool and dry place. Keep out of reach of children. **CONTAINER DISPOSAL:** IF EMPTY: Do not reuse the container. Place in trash or other for recycling if available. IF PARTLY FILLED: Call your local solid waste agency or call 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

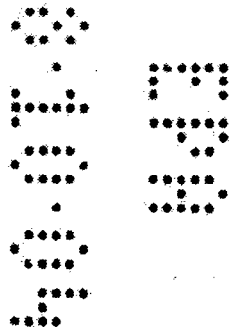
 Dependable Insect And Rodent Control Products For Over 60 Years

PIC Corporation
3101-1107W Elizabeth Ave., Linden, NJ 07036 USA
www.pic-corp.com
Made in USA

PA Reg. No. 206-37 EPA Est. No. 206-674



Stock #PUMP 100



Made in USA
PIC Corporation, 1101-1107
West Elizabeth Ave., NJ
07036 USA

BACK PANEL

WARNING: KEEP OUT OF REACH OF CHILDREN, INFANTS AND DOMESTIC ANIMALS. Instruct older children in proper use of this product. Keep out of reach of domestic animals. For External Use only
PIC Corporation, Linden, NJ EPA Reg. No. 3095-27 EPA Est. No. 3095-NJ-1

PIC X-100

Repel for Hours Against Mosquitoes, Biting Flies, Deerflies, Ticks, Chiggers & Gnats

Active Ingredient
Deet.....98.11%
Other Ingredients.....1.89%

Contents: 1 Fluid Ounce

FRONT PANEL

PRECAUTIONARY STATEMENT: Hazardous to Humans and Domestic Animals - CAUTION
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 using, drinking, chewing gum, using tobacco or using toilet.

FIRST AID:
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: 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 by mouth to an unconscious person.
IF INHALED: 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 treatment advice.
IF YOU SUSPECT A REACTION TO THIS PRODUCT: Discontinue use. Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a Poison Control Center for treatment advice.

HOT LINE NUMBER: In case of emergency call toll free 1-800-235-3024. Have the product container or label with you when calling a Poison Control Center or Doctor or going for treatment.

NOTE OF PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.

INSIDE PANEL

DIRECTIONS FOR USE
It is a violation of Federal Law to use this product in a manner inconsistent with the labeling.
READ AND FOLLOW ALL DIRECTIONS AND PRECAUTION ON THIS PRODUCT LABEL

General Precautions and Restrictions
Do not apply over eyes and mouth. 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 directly to face.

STORAGE AND DISPOSAL STATEMENT:
Do not contaminate water, food or feed by storage and disposal.
PESTICIDE STORAGE: Store in a cool and dry place. Keep out of reach of children.
CONTAINER 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 call 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

