SEP 1 2 1990

Ms. Ruth Trager d-Con Company, Inc. 225 Summit Avenue Montvale, NJ 07645

Dear Ms. Trager:

Subject: 6/12 Super Strength Premium Insect Repellent EPA Registration No. 3282-38 Your Application Dated July 2, 1990

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

- Submit the product-specific product chemistry and the data matrix for this new formulation.
- 2. The statement "Keep Out Of Reach of Children" must appear directly above the signal word "Caution."
- 3. Provide the flashpoint of the product with the propellent or change the physical and chemical precautions by adding the phrase "Extremely Plasmable."
- 4. The storage and disposal statement must appear under a separate "Storage and Disposal" heading.
- 5. Add the statement "Do not puncture or incinerate" to the storage and disposal statement.
- 6. Add the footnote "Contains petroleum distillates" to the ingredient statement.

BEST AVAILABLE COPY

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7. The precautionary labeling section must be changed to read:

Harmful if swallowed. May cause eye irritation. Avoid contact with eyes, lips or open cuts. Do not expose treated skin or clothing to fire, sparks or flame until liquid has evaporated. Do not allow children to rub eyes if hands have been treated.

8. Add a Statement of Practical Treatment to read:

STATEMENT OF PRACTICAL TREATMENT

If Swallowed: Call a physician or Poison

Control Center.

If On Skin: Hay cause skin reactions

in rare cases. If so, wash thoroughly with soap and water. Get medical attention

if irritation persists.

If In Eyes: Flush with plenty of water.

Get medical attention if irritation persists.

9. Submit a 1-year storage stability study. The formulated product must be analyzed for its active ingredients at time zero and during a year in 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.

Sincerely yours,

Phal Hutton

Product Manager (17)

Insecticide-Rodenticide Branch Registration Division (H7505C)

Enclosure

BEST AVAILABLE CON

ACCOUNTY OF A

front panel

6/12<sup>R</sup>

super strength

premium

insect

repellent

sprays on skin

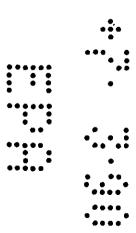
mild scent

ACTIVE INGREDIENTS:	
N-N-diethyl-m-toluamide	23.75%
other isomers	1.25%
* N-octyl bicycloheptene dicarbomide	5.00%
** Di-n-propyl isocinchomeronate	2.50%
INERT INGREDIENTS:	

- \* MGK 264 insecticide Synergist \*\* MGK Repellent 326 U.S. Pat No 2.757.120

CAUTION: KEEP OUT OF REACH OF CHILDREN See directions and cautions on back.

NET WT. 7 OZ.



back panel

6/12<sup>R</sup>

SUPER-STRENGTH FORMULA HAS POWER TO PROTECT FOR HOURS AGAINST BITING BUGS MILD SCENT TOO

Effectively repels: mosquitoes, black flies, gnats, fleas, ticks, chiggers, midges, sand flies, punkies, deer mites and stable flies.

DIRECTIONS: Spray evenly, spread thoroughly Pump valve about 10 inches from surface to be sprayed, holding can upright. Apply liberally to all exposed skin to leave skin slightly moist. Spread thoroughly with hands. To apply to face spray on hands and then spread on face, avoid eyes, mouth. For chiggers and ticks use as above, also apply to shoe tops, socks, around openings in outer clothing.

CAUTION: Apply only as directed. Do not spray on face, lips or into eyes. In case of contact with eye, flush with water. Avoid contact with plastics, acetates, rayon fabrics, varnished or painted surfaces.

PHYSICAL AND CHEMICAL HAZARDS: Contents under pressure. Do not use or store near heat or open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F or prolonged exposure to sun may may cause bursting. Do not reuse empty container. Wrap container and put in trash collection.

THE d-CON COMPANY, INC.. DISTR. 225 Summit Avenue Montvale, NJ 07645

EPA Reg No. 3282-38
EPA EST 11525-CA1 IL-1 RI-1 (See code on bottom)