JAN 24 2005

Michael Rekhelman A.B.C. Compounding Co., Inc. P.O. Box 16247 Atlanta, GA 30321

Subject: Revised Formulation For:

Insect Repellent

EPA Registration No. 3862-102 Application dated May 6, 2004

Dear Mr. Rekhelman:

The proposed amendment to the registration of the product cited above under the Federal Insecticide Fungicide And Rodenticide Act, as amended revising the formulation is acceptable subject to the comments listed

1) 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."

- 2) Change the Signal Word from Danger to Warning.
- 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.
- * 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 by a poison control center or a doctor.
- * Do not give anything by mouth to an unconscious person.

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 or doctor for treatment advice.

HOT LINE NUMBER

In case of emergency call toll free (insert number). Have the product container or label with you when calling a poison control center or doctor or going for treatment.

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.

The Confidential Statement Of Formula(CSF) dated May 6, 2004 is acceptable and has been made a part of the file for this product.

A copy of the Acute Toxicity review is enclosed for your records

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

Sincerely,

Richard Gebken
Acting Product Manager 10
Insecticide Branch

Registration Division (7505C)

ACCEPTED With COMMENTS In EPA Letter Dated: JAN 24 2005

Under the Federal Insecticide, Fungicite, and Rodenticide Act. as amended, for the pesticide registered under EPA Reg. No.

Insect
Ronolloni

for Personal Application and Clothing Repels Mosquitoes, Chiggers, Ticks, Deer Flies, Stable Files, Black Flies, Gnats and Fleas on Exposed Skin Surfaces.

ACTIVE INGREDIENT: DEET IN. N-diethyl-m-toluamide (m-DEET) + Related isomers] 15.00% INERT INGREDIENTS 85.00%

FIRST AID:

IF IN EYES: Hold eyelids open and flush with a steady, gentle stream of water for 15 minutes. Get medical

IF INHALED: Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth-tomouth. Get medical attention.

IF SWALLOWED: Call a physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. If person is unconscious, do not give anything by mouth and do not induce vomiting.

For chemical emergencies only, call: Infotrec 1-800-535-5853

KEEP OUT OF REACH OF CHILDREN DANGER

CONTENTS UNDER PRESSURE See back panel for additional precautionary statements

> VOLUME 8 FL. OZ. NET WT. 6 OZ. (170 GRAMS)

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS DANGER:

Harmful if swallowed. Do not get in eyes. Causes irriversable eye darmage. Wash thoroughly with soap and water after handling. Avoid swallowing or inhaling soray.

PHYSICAL OR CHEMICAL HAZARDS:

FLAMMABLE. Contents under pressure. Keep away from heat, sparks and open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

DIRECTIONS FOR USE:

Read and follow all directions and precautions on this product label. It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Do not spray in enclosed areas. Skin application for with its aluening, or not spray in encosed areas. Such approximon to mosquitoes, biting files, gnats, and fless. Hold unit 4 to 6 inches from the skin of arms or legs while applying with a slow sweeping motion until surface is slightly moistened. Rub with hand to insure even distribution. To apply to face and neck, spray in palm of hand in short bursts and spread on the skin sparingly and avoid eyes. Do not apply over cuts, wounds, or initiated skin. Do not apply near eyes and mouth, apply spaningly around ears. Do not apply to children's hands. Do not allow children to handle this product. When using on children to handle this product. When using on children, apply to your own hands and then put it on the child. Do NOT SPRAY DRECTLY ON FACE. Use just enough repellent to cover exposed skim and/or clothing. Do not use under clothing. Avoid over-application of this product. Frequent reapplication and saturation is unnecessary for effectiveness. After returning indoors, wash treated skin with soap and water. Wash treated clothing before wearing it again. Use of this product may cause skin reactions in rare cases. If you suspect that you or your child is reacting to this product, discontinue use, wash treated skin and call your local poison control center. If you go to a doctor, take this repellent with you. For protection against mosquitoes and biting flies, pay special attention to where biting through clothes occurs shoulders, elbows, seat of trousers, front of trousers, front of thighs, knees, and socks. For protection against chiquers (mites), fleas, and ticks, pay special attention to the socks, shoe tops, and fly, trouser legcuffs, trouser fly, and waistband, and the front fly and cuff fly of the shirt. Avoid contact with plastics, such as eyeglass frames, and such fabric as acetate rayon. Do not spray in enclosed area.

STORAGE AND DISPOSAL

Do not contaminate water, food, and feed by 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.

EPA EST. 9143-TX-1 EPA REG. NO. 3862-102 Manufactured by:

ABC COMPOUNDING, INC. Atlanta, GA 30321 ms4x572

