

MAR 22 2004

Rob R. Adams, Jr.  
ARI  
c/o Adams Technology Systems  
5145 Forest Run Trace - Suite B  
Alpharetta, GA 30022-4504

Subject: Bug Barrier 100%  
EPA Registration No. 7754-36  
Application dated May 22, 2000

Dear Mr. Adams:

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.

- \* 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.

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

4) Change the Storage And Disposal section to read:

PESTICIDE STORAGE: Store the product 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 toll free number which meets the criteria in paragraph II.E of PR Notice 2001-6) for disposal instructions. Never place unused product down any indoor or outdoor drain.

5) Change the statement, "Read All directions before using this product," to read " **READ AND FOLLOW ALL DIRECTIONS AND PRECAUTIONS ON THIS PRODUCT LABEL.** ".

6) The following statements must be grouped together in the Directions for Use section under the Subheading, General Precautions and Restrictions.

❖ Do not apply near 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 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 percent sign must be deleted from the product name. Bug Barrier 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.

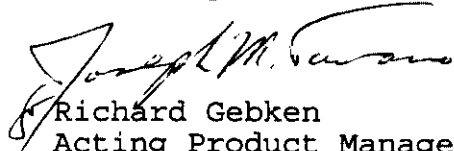
A stamped copy of the draft label is enclosed for your records. Submit two copies of the finished label revised in accordance with the comments listed above before the product is released for shipment under this amended label.

The Confidential Statement Of Formula (CSF) dated July 13, 2003 is acceptable and has been made a part of the file for this product.

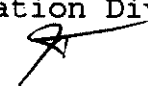
Product specific efficacy data will be required. Once the efficacy guidelines are in place, you will be notified of the efficacy requirements.

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)



7754-36

**Storage:** Store in a cool dry area away from heat or open flame.  
**Dispose:** Securely wrap original container in several layers of newspaper and discard in trash.