MAP. 12 2001

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.

*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.

Suse just enough repellent to cover exposed skin and/or clothing.

water.

Do not spray in enclosed areas. 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 quidelines 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)

ACCEPTE with COMMENT S In EPA Letter 1 -MAR 22 2004

representation of the second o

bug barrier 100%

INSECT REPELLENT UP TO 10 HOURS PROTECTION Repels Mosquitoes, Chiggers, Ticks, Deer Flies, Stable Flies, Black Flies, Gnats and Fleas on Exposed Skin Surfaces.

ACTIVE INGREDIENTS

N, N-diethyl-m-tolumide Other isomers

95.00% 5.00% 100.00%

KEEP OUT OF REACH OF CHILDREN

WARNING
See back panel for Additional
Precautionary Statement STATEMENT OF PRACTICAL TREATMENT
IF IN EYES: Plush with plusty of water.
Get medical attention.

ARI Not Weight 2 oz. (56.7 grams)
P.O. Bou 510 * Orchard Hill, GA 30266
1-888-REPELIT
EPA Reg. No. 7754-36 EPA Est. No. 7754-GA-1

PRECAUTIONARY STATEMENTS
HERE'S to Humana and Domenic Asimula
WARNING
KEEP OUT OF REACH OF CHILDREN
Instruct other children in the grouper use of the grender, they cause frys Injury. In case of contact with eyes, shash with parent of water and get medical advantion. Harmful it swellowed.
Anotic contact with the uyee and lep. Do not apply to gue-burned, damaged or inflated with.
Physical Hazards: Keep every frush open theme.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsist
with its labeling. "Read all directions before using this product."

with the labelling. "Read all directions before using this product."

-Do not opray in anchosed areas. "Do not apply over cash, wounds, or intrated skin. "Do not apply to eye see and mush and do not apply to the hands of young children. Do not spray directly on face. "Like just enough repellent to cover apposed skin and/or cichling. Do not use under clathing. And orversaposarus, Frequent reapplications and saturation is unnecessary for effectiveness. After returning indoors, weak treated skin with soap and writer. Weath treated clothing. "Use of this product may cause also reactions in rare cases. If you suppert the you or your child is reacting to this product, was heated skin and call your local poison control center. If you go to a doctor, take this repellent with you. If you'll be product the control with the control work of the control with the product was the sate disk and call your local poison control center. If you go to a doctor, take this repellent with you. If you have not not control center.

To Renel the Inserts Listed on the Front Panel.

Bennose protective eap. Apply to all supposed skin areas. Repeat so needed for ticks and chippers, since apply to shoe tops, soots and around openings in clothing. Avoid contact with plastics, such as eyeplass transs, and such fastic as souther aryon.

Storage and Disposed.

Storage and Disposal
Storage Store in a cool dry and away from heat or open farm.
Disposal Security wrap original container in several layers of a nor in neveral layers of neverspaper and discard in trash.