

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

WASHINGTON, D.C. 20460

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

February 3, 2009

Mr. Jamie Zajac  
Sherwin-Williams Diversified Brands  
101 Prospect Avenue  
Cleveland, OH 44115-1027

**Subject: Amended Reregistration Label For 856 Insect Repellent II**  
**EPA Registration No. 10900-72**

Dear Mr. Zajac;

The Agency in accordance with the Federal Fungicide and Rodenticide Act as Amended (FIFRA) has completed reviewing all of the information submitted with your application to support the reregistration of the aforementioned product in connection the **MGK® Repellent 326 RED**, and have concluded that your submission is acceptable with the following label revision provisions:

1. Page 1:

a. Ingredient Statement

- i. Revise the ingredient statement to include the other isomers within the DEET expression: "DEET.....25.00%."

2. Page 2:

a. Directions for Use

- i. Replace all instances of the statement "Avoid overexposure." With "Avoid over-application of this product."
- ii. Within the first paragraph, replace the statements "Do not spray directly onto face. Spray hands first and then use hands to wipe spray onto face." With: "If used on the face, spray on hands first and then apply sparingly and avoid eyes. Do not spray directly onto face."
- iii. Within the second paragraph, replace the statements "Do not spray directly on face. To apply to face, spray on hands and rub on." With "If used on the face, spray on hands first and then apply sparingly and avoid eyes. Do not spray directly onto face."
- iv. Within the third paragraph, remove the following sentences: "Frequent reapplication and saturation is unnecessary for effectiveness. Repeat as needed."
- v. Within the fourth paragraph, replace the sentence "Wash treated clothing." With: "Wash treated clothing before wearing it again."

b. Precautionary Statements

- i. Replace the Precautionary Statement with the following text:

**"HAZARDS TO HUMANS**

**CAUTION:** Harmful if swallowed. Causes moderate eye irritation. Avoid contact with eyes. Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet."

c. Environmental Hazards Statement

- i. This section may be removed from the label.

3. Page 3:

a. First Aid Section

- i. Replace the section:

**"IF ON SKIN OR ON CLOTHING**

-If you suspect a reaction to this product:

-Discontinue use.

-Rinse skin immediately with plenty of water for 15-20 minutes.

-Call a poison control center or doctor for treatment advice."

With the following:

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."

b. STORAGE AND DISPOSAL:

- i. Replace the STORAGE AND DISPOSAL section with the following text:

**"STORAGE AND DISPOSAL**

Do not puncture or incinerate!

**Pesticide Storage:** Store in a cool, dry area away from heat or open flame.

**Pesticide Disposal:**

**If Partially Filled:** Call your local solid waste agency or [toll free number]<sup>1</sup> for disposal instructions.

**If Empty:** Place in trash or offer for recycling, if available."

c. Warranty and Disclaimer Statement

The Warranty and Disclaimer statement must be revised to comply with the Agency's *Guidance on Warranty Statements* published October 17, 2006. A copy is available at the following internet site:

<http://www.epa.gov/pesticides/regulating/labels/warranty.pdf>

Otherwise, you may remove the Warranty and Disposal Statement from the label.

Either of the following revisions must be submitted as an amendment for Agency approval.

A toll-free telephone number must appear on all product labels for consumers to call for additional product information and to report incidents.

Current labels on DEET repellent products tend to dissolve from contact with the repellent (usually liquids). All reregistered DEET product labels must use materials that remain permanent and readable for the reasonable life of the product. The Agency determined in the DEET RED document that all aerosol and pump spray formulations must be packaged in

<sup>1</sup> Insert a toll free number which meets the criteria in paragraph II.E. of PR Notice 2001-6.

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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.

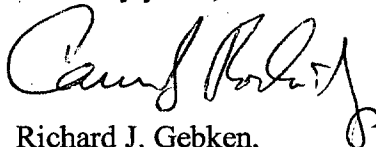
The Agency is in the process of developing and improving the current Efficacy Assessment Guidelines for repellent products. The Agency intends to defer the determination of any related efficacy data requirements supporting the claims that may appear on this label until these Efficacy Assessment Guidelines 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.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance Assurance. As an alternative, you may refer consumers to the company's phone number or email address.

**NOTE:** This product is not being re-registered under Section 4(g) of FIFRA at this time.

A copy of your label stamped "Accepted with Comments" is enclosed for your records. 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 Mr. Carmen Rodia at (703)-306-0327 or [rodia.carmen@epa.gov](mailto:rodia.carmen@epa.gov).

Sincerely yours,

*For* 

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

856  
INSECT REPELLENT II

Repels Mosquitoes, Chiggers, Ticks, Deer Flies, Stable Flies, Black Flies, Gnats and Fleas on Exposed Skin Surfaces.

ACTIVE INGREDIENTS:

DEET.....	23.75%
Other Isomers.....	1.25%
+N-Octyl bicycloheptene dicarboximide.....	5.00%
*Di-n-propyl isocinchomeronate.....	2.50%
OTHER INGREDIENTS:....	67.50%
TOTAL.....	100.00%

+MGK 264, Insecticide Synergist  
- MGK Repellent 326

EPA Reg. No. 10900-72

EPA Est. No. 10900-OH-1  
33915-MI-1

\*Refer to the bottom of container for production facility.

SPRAYON

KEEP OUT OF REACH OF CHILDREN  
CAUTION

See Side Panel for additional First Aid Statements

\_\_\_\_ oz. \_\_\_\_ g net. Wt.

ACCEPTED  
With COMMENTS  
In EPA Letter Dated:  
*February 3, 2009*  
Under the Federal Insecticide, Fungicide  
and Rodenticide Act, As amended, for the  
pesticide Registered under EPA Reg. No:

10900-72

## DIRECTIONS FOR USE:

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. Do not apply over cuts, wounds, or irritated skin. Do not apply near eyes and mouth. Apply sparingly around ears. 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. Do not apply more than 3 times per day to children ages twelve (12) and under. Use just enough repellent to cover exposed skin and/or clothing. ~~Avoid overexposure.~~ Do not use under clothing. After returning indoors, wash treated skin with soap and water. Wash treated clothing before wearing it again. ~~Do not spray directly onto face. Spray hands first and then use hands to wipe spray onto face.~~

To repel the insects listed on the front panel, first remove protective cap. Hold can at least 12 inches away, point valve in desired direction and press button to spray. Do not spray in enclosed areas. Apply to exposed skin areas. Do not apply over cuts, wounds, or irritated skin. Do not apply to eyes and mouth and do not apply to hands of young children. ~~Do not spray directly on face. To apply to face, spray on hands and rub on.~~ Use just enough repellent to cover exposed skin and/or clothing.

Do not use under clothing. ~~Avoid over exposure. Frequent reapplication and saturation is unnecessary for effectiveness. Repeat as needed.~~ For ticks and chiggers, also apply to shoe tops, socks and around openings in clothing. After returning indoors, wash treated skin with soap and water. ~~Wash treated clothing.~~

Use of this product may cause skin reactions in rare cases. If you suspect that you or your child is reacting to this product, wash treated skin and call your local poison control center. If you go to a doctor, take this repellent with you.

Avoid contact with plastics, such as eyeglass frames, and such fabric as acetate rayon.

**NOTICE:** This product contains a chemical known to the State of California to cause cancer.

### Precautionary Statements: Hazards to Humans and Domestic Animals

~~**CAUTION: KEEP OUT OF REACH OF YOUNG CHILDREN AND INFANTS.** Do not spray on face, lips or into eyes. In case of contact with eyes, flush with water. Harmful if swallowed. Avoid breathing spray mist. May cause eye irritation.~~

~~**ENVIRONMENTAL HAZARDS:** This pesticide is toxic to fish. Do not apply to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters or rinsate.~~

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**PHYSICAL HAZARDS:** **Extremely Flammable!** Contents under pressure. Do not use near fire, sparks, or flame. Do not puncture or incinerate container. Exposure to temperatures above 130 degree F may cause bursting.

**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 a 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 further treatment advice.

**IF ON SKIN OR ON CLOTHING**

- If you suspect a reaction to this product:  
~~Discontinue use.~~
- ~~Rinse skin immediately with plenty of water for 15-20 minutes.~~
- ~~Call a poison control center or doctor for treatment advice.~~

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

**~~STORAGE AND DISPOSAL:~~**

**~~Storage:~~** ~~Store in a cool, dry area away from heat or open flame.~~

**~~Disposal:~~** ~~Do Not Puncture or Incinerate!~~

**~~If empty:~~** ~~Place in trash or offer for recycling if available.~~

**~~If partly filled:~~** ~~Call your local solid waste agency for disposal instructions.~~

**Important Note:** Buyer assumes all risks of use, storage or handling of this material not in strict accordance with directions given herewith.

The Sherwin-Williams Company  
101 Prospect Avenue  
Cleveland, OH 44115