

NOV 06 1991

Barbara Brown  
Drexel Chemical Company  
2487 Pennsylvania Street  
P.O. Box 9306  
Memphis, TN 38109

Dear Ms. Brown:

Subject: Response to PR Notice 91-4  
Drexel Shoo  
EPA Reg. No. 19713-314  
Submission: October 29, 1991

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments listed below. Five copies of the finished labeling must be submitted prior to releasing the product for shipment.

- 1) Change the EPA Reg. No. to "19713-314".
- 2) Remove the word "liberally" from the last sentence of the first paragraph of the Directions for Use. Encouraging liberal application does not conform with the intent of PR Notice 91-4.
- 3) Although we still encourage inclusion, we have determined that it is acceptable to exclude the statement "If you go to a doctor, take this repellent with you". You do not need to submit an amendment to remove this from your label.

Sincerely,

*RFM*  
Richard F. Mcuntfort  
Product Manager 10  
Insecticide & Rodenticide Branch  
Registration Division (H7505C)

RSB

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**DREXEL SHOO  
INSECT REPELLANT LOTION**

**FOR MINIMUM PROTECTION FROM MOSQUITOES, ANTS  
BITING FLIES, TICKS, FLEAS, AND CHIGGERS (RED BUGS).**

**THE QUICK DRYING, NON OILY, LONG LASTING  
INSECT REPELLANT LOTION**

**ACTIVE INGREDIENT**

N,N-diethyl-toluamide*	50.00%
*Meta Isomer	47.5%
*Other Isomers	2.5%
<b>INERT INGREDIENT</b>	50.00%
<b>TOTAL.</b>	<b>100.00%</b>

**KEEP OUT OF REACH OF CHILDREN  
CAUTION**

**PRECAUTIONARY STATEMENTS**

Hazards to humans and domestic animals.

**CAUTION: HARMFUL IF SWALLOWED.** Causes substantial but temporary eye injury. Do not get in eyes or on clothing. Wear (goggles, face shield, or safety glasses). Harmful if swallowed. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

**STATEMENT OF PRACTICAL TREATMENT**

**IF SWALLOWED:** Drink promptly a large quantity of milk, egg whites, gelatin solution, or, if these are not available, drink large quantities of water. Avoid alcohol.

**IF IN EYES:** Immediately flush eyes with plenty of water. Get medical attention.

**IF ON SKIN:** Immediately remove contaminated clothing, INCLUDING SHOES, and wash skin with soap and plenty of water. If irritation develops, send for a physician.

**ENVIRONMENTAL HAZARDS**

Do not apply directly to water. Do not apply when weather conditions favor drift from areas treated. Do not contaminate water by cleaning of equipment or disposal of waste.

**PHYSICAL OR CHEMICAL HAZARDS**

Do not use, pour, spill or store near heat or open flame.

EPA REG. NO. 19713-87  
EPA EST. NO. ACCEPTED  
with COMMENTS  
In EPA Letter Dated

**MANUFACTURED BY  
DREXEL CHEMICAL COMPANY  
P.O. BOX 9306  
MEMPHIS, TN 38109**

NOV 06 1991

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

19713-314

READ ALL DIRECTIONS BEFORE USING THIS PRODUCT.

DO NOT APPLY OVER CUTS, WOUNDS, OR IRRITATED SKIN.

DO NOT APPLY TO EYES AND MOUTH AND DO NOT APPLY TO THE HANDS OF YOUNG CHILDREN. DO NOT SPRAY DIRECTLY ON FACE. 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.

AFTER RETURNING INDOORS, WASH TREATED SKIN WITH SOAP AND WATER. WASH TREATED CLOTHING.

USE OF THIS PRODUCT MAY CAUSE SKIN REACTION 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.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

To repel mosquitoes (salt marsh, flood water, yellow fever), gnats, biting flies (deer & stable), shake a few drops into palm, smear evenly and apply thoroughly to backs of hands, wrists, neck, ears, face and any other exposed skin. Sufficient amount of SHOO should be applied to give uniform film. Avoid applying excessive amounts to forehead as irritation to eyes may result. Applications to socks, shirt or trousers where bites occur will afford added protection. Shake a dozen drops into one hand, rub the hands together and rub lightly on clothing. Application to skin and clothing should be repeated when insects resume biting. To repel chiggers (red bugs), fleas and ticks, application of SHOO to clothing is more effective than to skin. Apply to clothing as described above. Also apply liberally along all openings of shirt, trousers and socks.

SHOO is safe to use on nylon, orlon, cotton and wool. Do not use on acetate, rayon or dynal. May have a plasticizing or softening action on certain synthetic fibers as well as paint, lacquer surfaces, and certain plastic items. Avoid smearing on goggles, watch crystals, painted helmets, etc.

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**STORAGE AND DISPOSAL**

Do not contaminate water, food, or feed by storage, disposal or cleaning of equipment.

**PESTICIDE DISPOSAL**

Pesticide, spray mixture, or rinse water that cannot be used according to label instructions must be disposed of according to Federal or approved state procedures under Subtitle C of the Resource Conservation and Recovery Act.

**CONTAINER DISPOSAL**

Triple rinse (or equivalent). Then offer for recycling or reconditioning, or disposal of in a sanitary landfill, or by incineration if allowed by state and local authorities.

**WARRANTY - CONDITION OF SALE**

**DIRECTIONS FOR USE** of this product are based on field use and tests believed reliable and should be followed carefully. It is however impossible to eliminate all risks associated with use of this product. Because such factors as weather conditions, foreign material and manner of use for application are all beyond the control of the Seller of this product, such things as crop injury, ineffectiveness or other unintended consequences may result.

**ALL SUCH RISKS ARE ASSUMED BY THE BUYER**

Seller warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes referred to in the directions for use. Seller makes no other warranties, express or implied, including **FITNESS OR MERCHANTABILITY**. In no case shall the Seller be liable for consequential, special or indirect damages resulting from the use or handling of this product. The foregoing is a condition of sale by the Seller and is accepted as such by the Buyer.