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Ms. Marcie Behan  
Pierson Laboratories, Inc.  
P.O. Box 157  
Saluda, NC 28773

12 FEB 1997

Dear Ms. Behan:

Subject: Label Amendment/Design Changes - Chigg Away  
EPA Reg No. 36864-1  
Your February 6, 1997 Fax

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable, provided that you make the following changes to the label:

- 1) Please refer to comment 3 and the last paragraph in our January 24, 1996 letter. Under Section 2 of FIFRA benzocaine is not considered an active ingredient and cannot be listed in the active ingredient statement. Since it is also regulated as a drug we discussed its listing on the label with FDA and agreed it could be listed on the label with an asterisk to inert ingredients as indicated in comment 3 of our letter. We would not object to qualifying that phrase to:

\*Contains 3% Benzocaine for Itch Relief

- 2) Under Precautionary Statements, revise the statement "As with all drugs..." to "As with all pesticides/drugs...".

Please be reminded also that the previously submitted CSF was not acceptable for reasons identified in our letter of January 24, 1996. An updated CSF should be submitted as soon as possible.

A stamped copy of the label is provided for your records.

Sincerely,

George T. LaRocca  
Product Manager (13)  
Insecticide-Rodenticide Branch  
Registration Division (7505C)

Enclosure

*MLW*  
2/12/97

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# Chigg Away

**Two Way Action**®

**1-RELIEVES ITCHING** due to insect bites, such as chiggers (redbugs), mosquitoes, ticks, fleas, fire ants: minor stings.

**2-REPELS chiggers (redbugs)**

Active Ingredients for Repelling Chiggers

Precipitated Sulfur U.S.P. 10%

Active Ingredients for Itch Relief

Benzocaine U.S.P. 3%

Inert Ingredients

87%

**KEEP OUT OF THE REACH OF CHILDREN  
SEE BACK PANEL FOR ADDITIONAL  
PRECAUTIONS**

**NET 4 FL. OZ. (118ML)**

ACCEPTED  
with COMMENTS  
in EPA Letter Dated

12 FEB 1997

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

36864-1

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6840-01-137-8456

**THIS PRODUCT HAS BEEN SEALED FOR YOUR PROTECTION. IF THE IMPRINTED, INNER-FOIL SEAL IS BROKEN OR MISSING, DO NOT USE.**

**DIRECTIONS FOR USE:** It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

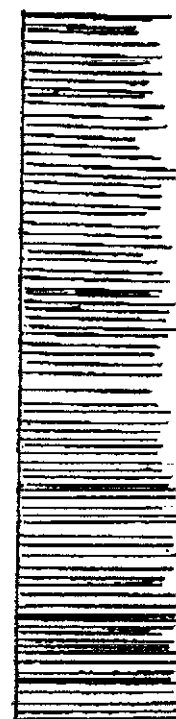
**INDICATIONS: 1-RELIEVES ITCHING** and discomfort due to nonpoisonous insect bites such as chiggers (redbugs), mosquitoes, ticks, sand fleas, no-see-ums, biting flies, fire ants, bees and wasps; swimmers itch. **DIRECTIONS:** Apply topically and rub in well as needed. The unique action of CHIGG-AWAY lotion carries prompt relief to the source of irritation. Provides soothing relief from itching. **2-REPELS CHIGGERS** (redbugs). **DIRECTIONS:** Apply around feet, ankles, waist and to skin under all areas of tight clothing and around all openings in outer clothing. Reapply after heavy perspiration.

**PRECAUTIONARY STATEMENTS: Hazards to Human and Domestic Animals. Caution.** For external use only. Keep away from eyes or other mucous membranes. Not for prolonged use. If the condition for which this product is used persists or if a rash or irritation develops, discontinue use and consult a physician. For use on intact skin only. Do not use on children younger than two years. As with all drugs, keep out of the reach of children. In case of accidental ingestion, contact a physician or poison control center at once.

**DISPOSAL:** Do not reuse bottle. Rinse thoroughly before discarding.

NDC NO: 45591-002-4  
EPA REG. NO: 36864-1  
EPA EST: 09300-MO-01 or 68689-NC-001

Manufactured for:  
**PIERSON LABORATORIES, INC.**  
**P.O. BOX 157, SALUDA, NC 28773**



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