

DEC 12 2003

Mitch Whitney
Quest Chemical Corporation
12255 FM 529
Houston, TX 77041

Subject: Revised Label For:
Bug Ban Plus Personal Insect Repellent
EPA Registration No. 44446-48
Application dated September 30, 2003

Dear Mr. Whitney:

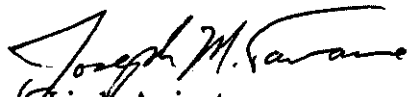

The proposed amendment to the registration of the product cited above under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended revising the label in accordance with PR Notices 2001-1 and 2001-6 is acceptable subject to the comments listed below. A stamped copy of the draft label is enclosed for your records.

- 1) Change the statement, "Read all directions before using this product.", to read "Read and follow all directions and precautions on this product label."
- 2) Add the following statements to the directions for use:
 - A) Apply sparingly around ears.
 - B) Do not allow children to handle this product.
 - C) When using on children, apply to your own hands and then put it on the child.
 - D) If used on the face, spray hands first and then apply sparingly and avoid eyes.
- 3) Delete the First Aid statement for skin and clothing since the intended use of this product is on the skin or clothing.
- 4) In the Ingredients Statement change the declaration for DEET to read DEET.
You should check with your supplier for the proper percentage of DEET which is dependant on the amount of active in your supplier's product. Your supplier of DEET no longer claims that their product is 100% DEET. You must change the amount of the source product of DEET to maintain your claim of 23.75% A revised Confidential Statement Of Formula must also be submitted
- 5) The efficacy guidelines are being revised. Once these guidelines are published efficacy data will be required. You must agree to submit this data.

Submit two copies of the finished label before the product is released for shipment under this revised label.

If you have any questions contact Joseph Tavano at (703) 305-6411.

Sincerely,


Linda Arrington
Acting Product Manager 10
Insecticide Branch
Registration Division (7505C)


SPRAYS RIGHTSIDE UP
NMOD 3SIDN

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS & DOMESTIC
ANIMALS**

CAUTION: Harmful if swallowed. May cause eye irritation. Avoid contact with eyes, lips or open cuts. Do not expose treated skin or clothing to fire, sparks or flame until liquid has evaporated. Do not allow children to rub eyes if hands have been treated.

FIRST AID

If inhaled:

- Move person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.
- Call a poison control center or doctor for further treatment advice.

If on skin or clothing:

- 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.

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 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 the poison control center or doctor.
- Do not give anything by mouth to an unconscious person.

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

PHYSICAL HAZARDS

EXTREMELY FLAMMABLE: Contents under pressure. Do not use near fire, heated surface, sparks or flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting. May damage some plastics,

varnished or painted surfaces. May be used on Nylon, Orlon, Wool or Cotton. DO NOT USE on Rayon, Spandex or Dynel.

DIRECTIONS FOR USE

Read all directions before using this product. It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Do not spray in enclosed areas.

Remove protective cap, and spray from a distance of 8-12 inches from surface to be protected. Slightly moisten surface—saturation is not necessary. Use slow sweeping motion.

FOR EXPOSED SKIN AREAS, to repel flies, gnats and mosquitoes: Use as directed above. **AVOID CONTACT WITH EYES OR MOUTH.** For treating face, spray in palm of hand, rub palms together and rub on face.

FOR CLOTHING, to repel ticks, fleas and chiggers (see CAUTION)—Apply along all openings of clothing, such as around the neck band, the fly and cuffs of trousers, tops of socks, eyelets of shoes and areas of clothing which may contact the ground, weeds or other growth.

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 overexposure. Frequent reapplication and saturation is unnecessary for effectiveness. Avoid contact with plastics, such as eyeglass frames, and such fabric as acetate rayon.

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.

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 or 1-800-CLEANUP for disposal instructions.

CONTAINS (CAS#): Isopropyl Alcohol (67-63-0), Propane-Isobutane (68476-85-7), Diethyltoluamide (134-62-3), Insecticide Synergist (113-48-4), Di-n-propyl Isocinchomerate (136-45-8)
HMS RATINGS: HEALTH-1, FLAMMABILITY-2, REACTIVITY-1, PERSONAL-1

For MSDS or additional product information:
www.questchemicalcorp.com

ITEM 458

BUG BAN PLUS

Personal Insect Repellent

Repels Mosquitoes, Biting Flies, Chiggers, Ticks & Other Small Flying Insects Including Fleas on Exposed Skin Surfaces

ACTIVE INGREDIENTS:

DEET (N, N-diethyl-m-toluamide)	23.75%
*N-Octyl Bicycloheptene Dicarboximide	5.00%
**Di-n-propyl isocinchomerate	2.50%
OTHER INGREDIENTS:	68.75%

*MGK® 264, Insecticide Synergist
**MGK® Repellent 326

MGK: Registered trademark of McLaughlin Gormley King Co.

EPA Reg. No. 44446-48 EPA Est. No. 44446-TX-1

**KEEP OUT OF REACH OF CHILDREN
CAUTION:**

See Additional Precautionary Statements on Back Panel

NET WT. 6.5 OZ. (184 g)

Manufactured By

QUEST
CHEMICAL CORPORATION

Houston, Texas 77041

**ACCEPTED
with COMMENTS
In EPA Letter Dated:**

DEC 12 2008

Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
44446-48