



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460-0001

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

May 29, 2008

Mr. Mitch Whitney, Vice-President  
Quest Chemical Corporation  
12255 FM 529 Road  
Northwoods Industrial Park  
Houston, TX 77041-2805

**Subject: Acceptance of Amended Labeling  
BUG BAN PLUS Personal Insect Repellent, EPA Reg. No. 44446-48  
Your Submission Dated September 13, 2007**

Dear Mr. Whitney:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable with the following provision(s):

General Comment(s):

1. Delete all text throughout the label marked with "strikethrough."
2. The words "**INSECT REPELLENT**" must be displayed prominently on the front panel of this product label as well as on the alternate brand name(s), immediately after the brand name in capital lettering, with large, contrasting, bold-faced type.
3. Delete the website listed on the last page of this label since it is considered collateral labeling.

Marketing Claims section comment(s):

4. In the 2<sup>nd</sup> marketing claim, expand on the term "Encephalitis", only to include those that occur within the continental United States and/or its territories or remove the term "Encephalitis."
5. In the 2<sup>nd</sup> marketing claim, delete "Dengue" since this insect-borne disease does not occur within the continental United States and/or its territories.

Precautionary Statements, Hazards to Humans and Domestic Animals section comment(s):

6. Revise this section heading to read: "Hazards to Humans" This product is not registered for application to domestic animals.
7. Based on the applicable acute toxicity review for this product, replace this section with: "Causes moderate eye irritation. Harmful if swallowed or inhaled. Avoid contact with eyes. Avoid breathing spray mist. Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse."

First Aid Statement comment(s):

- 8. Based on the applicable acute toxicity review for this product, you should insert the following text as a 2<sup>nd</sup> sentence in the last row of the First Aid section: **"For additional information on this pesticide product (including health concerns, medical emergencies or pesticide incidents), you may call 1-800-xxx-xxxx and/or the National Pesticide Information Center at 1-800-858-7378."**<sup>1</sup>

Physical Hazards section comment(s):

- 9. Replace this section with: **"EXTREMELY FLAMMABLE:** Contents under pressure. Keep away from fire, sparks and heated surfaces. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting."

Directions for Use section comment(s):

- 10. To facilitate inclusion of language from the DEET and MGK® Repellent 326 REDs, replace this section with:

**"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.**

Apply this product only to exposed skin and/or clothing as directed on this product label. Do not spray in enclosed areas. Do not allow children to handle this product. Do not apply to children's hands. Do not apply more than 3 times per day on children ages twelve (12) and under. Do not apply over cuts, wounds or irritated skin. **Use of this product may cause skin reactions in rare cases. 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.**

**FOR EXPOSED SKIN AREAS,** to repel flies, gnats and mosquitoes: Hold container upright about 8 to 12 inches from surfaces to be protected, and spray with a slow sweeping motion. Spray and spread evenly with your hand to slightly moisten all exposed skin. Do not spray directly onto face. If used on the face, spray on hands first and then apply sparingly and avoid eyes. Do not apply near eyes and mouth. Apply sparingly around ears. When using on children, apply to your own hands and then put it on the child. Use just enough repellent to cover exposed skin and/or clothing. Avoid over-application of this product. After returning indoors, wash treated skin with soap and water.

**FOR OUTER SURFACES OF CLOTHING,** to repel, ticks, fleas and chiggers: Apply along all openings of clothing such as around the neck band of shirts, the fly and cuffs of pants and trousers, tops of socks, eyelets of shoes and around other openings in clothing which may contact the ground, weeds or other vegetative growth. Do not use under clothing. Wash treated clothing before wearing it again.

NOTE: May be used on nylon, Orlon, Wool or Cotton. May damage some plastics, varnished or painted surfaces. **DO NOT USE** on Rayon, Spandex or Dynel."

Storage and Disposal Statement section comment(s):

- 11. Revise the line labeled as **"Storage:"** to read **"Pesticide Storage:"**
- 12. Revise the line labeled as **"Disposal:"** to read **"Pesticide Disposal:"**

<sup>1</sup> Please note that the "1-800-xxx-xxxx" number listed must be available twenty-four (24) hours per day, seven (7) days per week for answering and responding to any medical emergencies or health concerns.

To be eligible for reregistration, aerosol and pump spray formulations must be packaged in 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.

Quest Chemical Corporation should also note that a notice of availability of EPA's RED for products containing MGK® Repellent 326 was published in the *Federal Register* on May 23, 2003 (Volume 68, Number 100, Pages 28216-28218). In addition, EPA's RED for products containing products containing MGK® 264 was published in the *Federal Register* on July 26, 2006 (Volume 71, Number 143, Pages 42381-42383). As a result, additional data and/or labeling changes may be required for products containing MGK® Repellent 326 and MGK® 264.

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.

A copy of your label stamped "Accepted with Comments" is enclosed for your records. Please submit two (2) copies of the final printed labeling, incorporating the above changes, before releasing the product for shipment. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product bearing amended labeling constitutes accepting of these conditions.

If you have any questions about this label review, please contact Mr. Carmen J. Rodia, Jr. at (703) 306-0327 or via e-mail at [Rodia.Carmen@epa.gov](mailto:Rodia.Carmen@epa.gov).

Sincerely yours,



Richard J. Gebken,  
Product Manager (10)  
Insecticide Branch,  
Registration Division (7505P)

Enclosure: Copy of label stamped "Accepted with Comments"

044446-00048 D394200

**BUG BAN PLUS**  
**Personal Insect Repellent**

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

**Repels Mosquitoes Which May Carry Diseases  
Such as West Nile Virus, Encephalitis and Dengue**

**ACTIVE INGREDIENTS:**

DEET	22.56%
*N-Octyl Bicycloheptene Dicarboximide	5.00%
**Di-n-propyl isocinchomeronate	2.50%
<b>OTHER INGREDIENTS:</b>	<b>69.94%</b>
<b>TOTAL:</b>	<b>100.00%</b>

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

MGK: Registered trademark of McLaughlin Gormley King Co.

**ACCEPTED  
with COMMENTS  
in EPA Letter Dated  
May 29, 2008**  
Under the Federal Insecticide,  
Fungicide, and Rodenticide Act,  
as amended, for the pesticide  
registered under EPA Reg. No.  
44446-48

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)**

SPRAYS RIGHT SIDE UP/UPSIDE DOWN

**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 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 and follow all directions and precautions on this product label. 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. Apply sparingly around ears. Do not allow children to handle this product. When using on children, apply to your own hands and then put it on the child. If used on the face, spray hands first and then apply sparingly and avoid eyes.

**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

6/6  
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 Isocinchomeronate (136-45-8) [ Acetone (67-64-1)]

**HMIS RATINGS:** HEALTH-1, FLAMMABILITY-2, REACTIVITY-1, PERSONAL-1

~~For MSDS or additional product information:~~

~~[www.ghostchemicalcorp.com](http://www.ghostchemicalcorp.com)~~

**ITEM 458**

**Alternate Text is listed in [brackets].**