



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

SEP 08 2008

Mr. Mitch Whitney, Vice President
Quest Chemical Corporation
1255 FM 529
Houston, TX 77041

Subject: Amended Reregistration Label For: Bug Ban Plus Personal Insect Repellent
EPA Registration No. 44446-48

Dear Ms. Sharp;

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 **DEET RED**.

1. Page 1:
 - a. Rephrase the marketing claim as follows: "Repels Mosquitoes Which May Carry Diseases Such as West Nile Virus, Encephalitis (St. Louis, Eastern equine, Western equine, LaCrosse, Cache Valley) and Dengue"¹
2. Page 2:
 - a. Rephrase the paragraph within the Precautionary Statements as follows:
"CAUTION: Harmful if swallowed. Causes moderate eye irritation. Avoid contact with eyes. ~~Do not expose treated skin or clothing to fire, sparks or flame until liquid has evaporated. This pesticide is toxic to fish. Do not apply directly 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. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco.~~"
 - b. Within the First Aid Section, you may remove the following text, since this product is categorized as Category IV for Acute Inhalation:
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."
 Per the DEET RED, A toll-free telephone number must appear on all product labels for consumers to call for additional product information and to report incidents.
3. Page 2 & 3:

1 The Agency does not permit claims for a disease that exists outside of the United States.

- a. Revise the Physical and Chemical Hazards language as follows:

“PHYSICAL AND CHEMICAL 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. Do not expose treated skin or clothing to fire, sparks or flame until liquid has evaporated. ~~May damage some plastics, varnished or painted surfaces. May be used on Nylon, Orion, Wool or Cotton. DO NOT USE on Rayon, Spandex or Dynel.”~~

- b. Replace the entire text within the Directions for Use with the following:

“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 apply to children’s hands. Do not allow children to handle this product. 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. Do not use under clothing. Avoid over-application of this product. After returning indoors, wash treated skin with soap and water. Wash treated clothing before wearing it again. 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. Do not spray in enclosed areas. If used on the face, spray on hands first and then apply sparingly and avoid eyes. Do not spray directly onto face.

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.

FOR CLOTHING, to repel ticks, fleas and chiggers—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.

Avoid contact with plastics, such as eyeglass frames, and such fabric as acetate rayon. Exposure to temperatures above 130°F may cause bursting. May damage some plastics, varnished or painted surfaces. May be used on Nylon, Orion, Wool, Cotton. **DO NOT USE** on Rayon, Spandex or Dynel.”

4. Page 4:

Remove the following statement: “CONTAINS (CAS#): Isopropyl Alcohol (67-63-0), Propane-isobutane (68476-85-7), Diethyltoluimide (134-62-3), Insecticide Synergist (113-48-4), Di-n-propyl Isocinchomeronate (136-45-8).” This information is incorrect, and or incomplete.

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

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 FIFRA Sec. 4(g) at this time.

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 Carmen Rodia at (703)-306-0327 or rodia.carmen@epa.gov.

A copy of your label stamped "Accepted with Comments" is enclosed for your records.

Sincerely,



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

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%
OTHER INGREDIENTS:	<u>69.94%</u>
TOTAL:	100.00%

*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)

ACCEPTED
with COMMENTS
In EPA Letter Dated
9-8-08
 Under the Federal Insecticide,
 Fungicide, and Rodenticide Act,
 as amended, for the pesticide
 registered under EPA Reg. No.
44446-48

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. This pesticide is toxic to fish. Do not apply directly 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.

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:

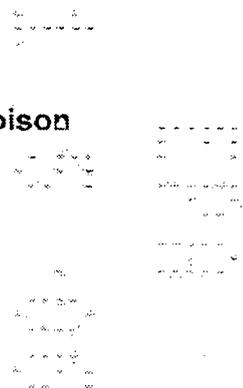
- Call poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to do so by the poison control center or doctor.
- Do not give anything by mouth to an unconscious person.

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.

PHYSICAL HAZARDS



6/7

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

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 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.

GENERAL PRECAUTIONS AND RESTRICTIONS: 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. Do not spray directly onto face. If used on the face, spray hands first and then apply sparingly and avoid eyes. 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)

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

ITEM 458