

4.001  
29 JAN 1992

Douglas Thiele  
Innovative Chemical Corporation  
55 Woodridge Drive  
Amherst, NY 14228

Dear Mr. Thiele:

Subject: Response to PR Notice 91-4 - DEET LIP  
American Trail Insect Repellent  
EPA Reg. No. 46075-1  
Submissions: January 14, 1992

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. One copy of the finished labeling must be submitted prior to releasing the product for shipment.


- 1) All 100% DEET registrations are to use the signal word "warning" due to eye irritation. Change the signal word to Warning on the front of the label and proceed the narrative of the Hazards to Humans and Domestic Animals section with "Warning".
- 2) Move the statement "Avoid contact with synthetic fabrics such as acetate and rayon." to the directions for use section. This is not clearly a hazard to humans.
- 3) Add the "Storage and Disposal" heading to the spray cylinder label.
- 4) Add the phrase "It is a violation of Federal Law to use this product in a manner inconsistent with its labeling" to the lotion label.
- 5) Change the EPA registration number to "46075-1" on the lotion label. We view these two labels as being for the same registered product. Please submit a draft label for review for your product "46075-2" prior to the DEET Label Improvement Program's August 1992 deadline.

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It is not necessary for you to submit distributor labels to U.S. EPA for review. It is your responsibility to ensure those labels are in compliance with accepted labeling.

Although we still encourage inclusion, we have determined that it is acceptable to exclude the statement from your label, "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,

  
Richard F. Mountfort  
Product Manager 10  
Insecticide & Rodenticide Branch  
Registration Division (H7505C)

RSB

2 OZ. OVAL



### INSECT REPELLENT

UP TO 10 HOURS PROTECTION - From Mosquitoes Chiggers Ticks Deer flies, Stable flies Black flies Gnats and fleas on Exposed Skin Surfaces

100% ACTIVE INGREDIENTS  
N,N diethyl meta tolucamide 95%  
Other Isomers 5%

**CAUTION**  
Keep Out of Reach of Children. See Back Panel for Additional Precautionary Statements

INNOVATIVE CHEMICAL CORP.  
N. TONAWANDA, NY 14120

EPA Est. No. 46075-NY1  
EPA Reg. No. 46075-2 2 FL OZ

46075-1

Read all directions before using this product.  
**PRECAUTIONARY STATEMENTS, HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

**CAUTION:** Harmful if swallowed. Do not apply over cuts, wounds, sunburned or irritated skin. Do not apply to eyes and mouth and do not apply to the hands of young children. In case of contact with eyes, flush with plenty of water. If irritation persists, get medical attention. Do not use under clothing. Do not expose treated surfaces near fire or flame. Avoid contact with synthetic fabrics such as acetate and rayon. 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. If you go to a doctor, take this repellent with you.

**DIRECTIONS FOR USE:** To repel insects on the face panel, apply as lotion to all exposed areas. Use sparingly, 2-4 drops per application. Repeat as needed. Use just enough repellent to cover exposed skin and/or clothing. Avoid overexposure. Frequent reapplication and saturation is unnecessary for effectiveness. For ticks and chiggers, also apply to shoe tops, soles and around openings in clothing. After returning indoors, wash treated skin with soap and water. Wash treated clothing.

**STORAGE AND DISPOSAL:** Storage: store upright in a cool, dry area away from heat or open flame. Disposal: do not re-use empty container. Wrap container and put in trash collection.

2 OZ. SPRAY CYLINDER



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INNOVATIVE CHEMICAL CORP.  
N. TONAWANDA, NY 14120

EPA Est. No. 46075-NY1  
EPA Reg. No. 46075-1 2 FL OZ

46075-1

Warning

Read all directions before using this product.  
**PRECAUTIONARY STATEMENTS:** A violation of Federal Law to use this product in a manner inconsistent with its labeling.

**HAZARDS TO HUMANS AND DOMESTIC ANIMALS:** Harmful if swallowed. Do not apply over cuts, wounds, irritated or sunburned skin. Do not apply to eyes and mouth and do not apply to the hands of young children. In case of contact with eyes, flush with plenty of water. If irritation persists, contact physician. Do not use under clothing. Do not expose treated surfaces to fire or flame. Avoid contact with synthetic surfaces and fabrics. Use of this product may cause skin reactions in rare cases. If you suspect that you or your child is reacting, wash treated skin and call your local poison control center. If you go to a doctor, take this repellent with you. **KEEP OUT OF REACH OF CHILDREN.**

**DIRECTIONS FOR USE:** To repel insects listed on the front panel: Do not spray in enclosed areas. Hold container upright 4 to 6 inches from skin or clothing and spray. For maximum protection, spray evenly with hand to motion exposed skin. Do not spray directly on face. To apply to face, spray in palm of hand and spread sparingly to face and neck. Apply along ear-logs of clothing such as inside of neck band, fly -1 -1 of trousers, tops of socks and eyelets of shoes. Use just enough repellent to cover exposed skin and/or clothing. Avoid overexposure. Frequent reapplication and saturation is unnecessary for effectiveness. After returning indoors, wash treated skin with soap and water. Wash treated clothing.

Store upright in a cool, dry area away from heat or open flame. Do not re-use empty container. Wrap container and put in trash.

Storage & Dis.

ACCEPTED  
with COMMENTS  
in EPA Letter Dated  
29 JAN 1992

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

46075-1

BEST AVAILABLE COPY