

50404-8

8/29/2008

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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

August 29, 2008

Mr. Timothy H. Dickens, Ph.D.,
Authorized Agent for Coulston Products, Inc.
c/o Scientific Coordination, Inc.
4629 Cherry Valley Drive
Rockville, MD 20853-0030

**Subject: Label Amendment, Delete Clothing Statements
Coulston's® DURANON® INSECT REPELLENT, EPA Reg. No. 50404-8
Your Rebuttal Dated June 23, 2008**

Dear Mr. Dickens:

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):

Directions for Use section comment(s):

1. The Agency concurs with your suggestion to delete the referenced clothing statements in your rebuttal dated June 23, 2008.
2. Insert the following statement immediately following the 5th sentence in paragraph 1: "Do not apply this product to the outer surfaces of clothing."

Coulston Products, Inc. should note that 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.

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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.

Sincerely yours,



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

Enclosure: *Copy of label stamped "Accepted with Comments"*

050404-00008 D396123

This Coulston Controlled Release insect repellent uses the patented "Sub Micron Encapsulation" technology as developed by Coulston Products Inc. This process evens out the evaporation rate of DEET by encapsulating the DEET in a protein. Each application provides effective protection while at the same time limiting the skin's exposure to DEET thereby significantly reducing possible deet absorption.

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS
CAUTION

Avoid contact with eyes. Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.

FIRST AID

If Swallowed:	<ul style="list-style-type: none"> • Call a 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 In Eyes :	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, continue rinsing the eye. • Call a poison control center or doctor for treatment advice.
<p>Have the product container or label with you when calling a poison control center or doctor or going for treatment. [Questions?: 800-940-4464, Weekdays from 9-5 EST.]</p>	

NOTE: The First Aid statement's grid format will be used if market label space permits; otherwise a paragraph format will be used.

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. Use Restrictions:** Apply this product only to exposed skin as specified on this label. Do not use it near food. Do not use under clothing. Do not apply near eyes and mouth, and apply sparingly around ears. Never use repellents over cuts, wounds or irritated skin. Do not allow children to handle this product, and do not apply to children's hands. Do not use on infants. Do not apply more than 3 times per day to children ages twelve (12) and under. [Will not damage cotton, wool or nylon.] Do not apply on or near acetate, rayon, Spandex or other synthetic fabrics (other than nylon), furniture, plastics (such as eyeglasses and watch crystals), leather and painted or varnished surfaces (including automobiles). **Use of this product may cause skin or allergic 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 repellent product with you.**

Application: Squeeze into one hand, rub hands together and apply thoroughly in a thin layer to the forearms. Use additional lotion for upper arms. Repeat for other exposed areas. To apply to

face, squeeze lotion into palm of hand and spread sparingly on face and neck. When using on children, apply to your own hands and then put it on the child. Use just enough repellent to cover exposed skin. Wipe excess from hands after applying. Avoid over-application of this product. Heavy application and saturation is unnecessary for effectiveness. For maximum protection, spread evenly with hand to moisten all exposed skin. If biting insects do not respond to a thin film of repellent, apply a bit more. After returning indoors wash treated skin with soap and water or bathe. This is particularly important when this product is used repeatedly in a day or on consecutive days.

STORAGE AND DISPOSAL

Pesticide Storage: Store in a cool, dry place inaccessible to children. Pesticide Disposal: If empty: Do not reuse this container. Place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency [or toll free number or website which meets the criteria in paragraph II.E., PR Notice 2007-1] for disposal instructions. Never place unused product down any indoor or outdoor drain.

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~ OPTIONAL MARKETING LANGUAGE ~

Provides Protection against Mosquitoes for 11 hours

Lasts 11 hours

[Enjoy] 11 hours of protection from mosquitoes

Lasts for 11 hours [against mosquitoes]

[Proven][Effective] protection for 11 hours against mosquitoes [that may transmit [West Nile virus] [St. Louis encephalitis] [Western equine encephalitis] disease(s)]

20% DEET in a Controlled Release Formula

Insect Repellent

Lotion

Repels Mosquitoes

Odorless after Application

Time Release [DEET] Formula

Low DEET Absorption Formula

Odorless Time-Release Formula

Family [Insect Repellent]

Controlled Release

Odorless

Non-Greasy

Repels mosquitoes that may transmit West Nile Virus

Repels mosquitoes that may carry [St. Louis] [Eastern equine] [Western equine] [Lacrosse] and [Cache Valley]