

MAR. 22 2004

N. Uminski  
Triad Chemical Co.  
2005 Port Marnock Lane  
Orlando, FL 32826

Subject: D Bug-100  
EPA Registration No. 53356-3  
Application dated October 18, 1999

Dear Mr. Uminski :

The proposed amendment to the registration for the product cited above under The Federal Insecticide, Fungicide And Rodenticide Act, as amended revising the label in response to the DEET RED is acceptable subject to the comments listed below:

1) Change the ingredients statement to read:

ACTIVE INGREDIENT  
DEET.....98.11%  
Other INGREDIENTS..... 1.89%

2) Change the Precautionary Statements to read as follows:

⌘ Causes substantial but temporary eye injury. Harmful if swallowed. Do not get in eyes. Use of this product may cause skin reactions in rare cases. Wash treated clothing before wearing it again. Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.⌘

3) Change the First Aid section to read:

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 five minutes, then continue rinsing.
- \* Call a poison control center or doctor for treatment advice.

IF SWALLOWED:

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

IF YOU SUSPECT A REACTION TO THIS PRODUCT:

- \* Discontinue use.
- \* 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.

HOT LINE NUMBER

In case of emergency call toll free (insert number). Have the product container or label with you when calling a poison control center or doctor or going for treatment.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.

4) Change the Storage And Disposal section to read:

PESTICIDE STORAGE: Store the product in a cool and dry place. Keep out of reach of children.

CONTAINER 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 which meets the criteria in paragraph II.E of PR Notice 2001-6) for disposal instructions. Never place unused product down any indoor or outdoor drain.

5) The following statements must be grouped together in the Directions for Use section under the Subheading, General Precautions and Restrictions.

- ❖ Do not apply near eyes and mouth.❖
- ❖ Apply sparingly around ears.❖
- ❖ Do not apply over cuts, wounds or irritated skin.❖
- ❖ Do not allow children to handle this product.❖
- ❖ Do not apply to children's hands.❖
- ❖ 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.❖
- ❖ 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.❖

This product is not being re-registered at this time. Product specific efficacy data will be required. Once the efficacy guidelines are in place, you will be notified of the efficacy requirements.

Also, to be eligible for re-registration, the product must be packaged in containers utilizing a concave trigger to help aim the product or other comparable mechanism that will ensure that the product will not be inadvertently sprayed in the eyes.

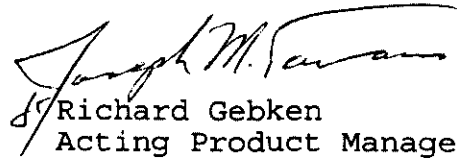
A stamped copy of the draft label is enclosed for your records. Submit two copies of the finished label revised in accordance with the comments listed above before the product is released for shipment under this amended label.

Submit a revised The Confidential Statement Of Formula(CSF) for this product.


Product specific efficacy data will be required. Once the efficacy guidelines are in place, you will be notified of the efficacy requirements.

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

Sincerely,



Richard Gebken  
 Acting Product Manager 10  
 Insecticide Branch  
 Registration Division (7505C)



# D-BUG-100

INSECT REPELLENT  
LOTION

Repels Mosquitoes, Biting Flies, Gnats,  
Chiggers, Ticks, and Fleas. Will Last Four to Six Hours.

Resistant to perspiration,  
water and wear. Not greasy.

ACTIVE INGREDIENTS  
Meta DEET.....95%  
Other isomers.....5%

KEEP OUT OF REACH OF CHILDREN

PRECAUTIONARY STATEMENTS

WARNING

Hazard to Humans and Domestic Animals

Causes eye irritation. Harmful if swallowed. Avoid contact with eyes or lips. Instruct older children in the proper use of this product and keep it from infants and young children. Do not let children rub their eyes if hands have been treated.

FIRST AID:

If in Eyes: Flush eyes with plenty of water. Get medical attention if irritation persists.

If Swallowed: Call a physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person.

Do not use on synthetic fibers other than nylon.

EMERGENCY NUMBER 1-888-622-3284

NET 3 fl. Oz.

ACCOUNTED  
with CONTAINER  
In EPA FILE # 53356-3

MAR 22 2004

53356-3

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 BEFORE USING THIS PRODUCT.

Do not spray in enclosed areas. Do not apply over cuts, wounds, or irritated skin. Do not apply near eyes and mouth. Apply sparingly around ears.

Do not apply to the 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. Do not spray directly on face.

Use just enough repellent to cover exposed skin and/or clothing. Do not use under clothing.

Avoid over-application of this product. Avoid overexposure. Frequent reapplication and saturation is unnecessary for effectiveness. 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.

Remove cap. Aim arrow on valve toward surface to be sprayed. Hold container 6 to 8 inches from the surface and depress valve. Apply to all exposed areas of the skin except face. To apply to face, spray a small quantity on hands and spread on face. For ticks and chiggers apply to clothing openings and cuffs.

STORAGE: Store in a cool dry area away from heat or open flame. Disposal: Do not reuse container. Wrap and put in trash.

PHYSICAL OR CHEMICAL HAZARDS: FLAMMABLE:

KEEP AWAY FROM HEAT OR OPEN FLAME.

TRIAD CHEMICAL COMPANY

2005 PORT MARNOCK LANE, FL 32826

EPA REG.NO 53356-3 EPA EST. NO. 53356-NJ-3