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07 20 2007 UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460-0001



OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

July 20, 2007

Mr. Timothy H. Dickens, Ph.D. Registered Agent Associated Registrations c/o Scientific Coordination, Inc. 4629 Cherry Valley Drive Rockville, MD 20853-1110

Subject: Amended Labeling, Resubmission in Response to Agency Review Dated May 9, 2007 SUPER GUARD INSECT REPELLENT, EPA Registration No. 54287-2 Your Resubmission Dated June 20, 2007

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:

Storage and Disposal section comment(s), page 2 of 2:

1. Replace the existing section with the following:

STORAGE AND DISPOSAL

Pesticide Storage: Store this product 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.

The optional marketing claim "Repels mosquitoes that may carry West Nile virus" requires in part the submission of product-specific efficacy data. In accordance with the Agency's January 5, 2004 letter, this data requirement remains applicable. Once the efficacy performance guidelines for repellents are in place, you will be notified of all efficacy data requirements.

Further, to be eligible for reregistration, aerosol and pump spray formulations must be packaged in containers utilizing a concave trigger to help aim the product or another comparable mechanism that will ensure that the product will not be inadvertently sprayed in the eyes.

A stamped copy is attached for your records. Please submit two (2) final printed copies of the referenced label, incorporating the above changes, before releasing the product for shipment. If you have any questions regarding the label review, please contact Mr. Carmen J. Rodia, Jr. at (703) 306-0327 or via e-mail at *Rodia.Carmen@epa.gov.*

Sincerely yours,

"he

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

Attachment

24

SUPER GUARD INSECT REPELLENT – FINAL

PAGE 1 of 2



~ OPTIONAL LANGUAGE ~

Repels Black Flies, Chiggers, Deer Flies, Fleas, Gnats, Mosquitoes, Stable Flies and Ticks On Exposed Skin Surfaces-Value Size-Low Odor Formula-MAXI DEET[™] FORMULA DEET Spray Pump (Spray) (Squirt)

Up to 10 Hours Protection from mosquitoes and biting flies (Up To 10 Hours Protection Against) Mosquitoes, Biting Flies, Chiggers, Ticks, Fleas & Gnats Repels mosquitoes that may carry West Nile Virus Repels mosquitoes that may carry diseases Repels mosquitoes that may carry (St. Louis) (Eastern equine) (Western equine) (Lacrosse) (Cache Valley) (Venezuelan equine) encephalitis Repels mosquitoes that may carry (Dengue Fever) Repels ticks that may carry (Lyme disease) (Rocky Mountain Spotted Fever) (Tick Paralysis) (Ehrlichiosis) (Powassan Encephalitis) Repels black flies Provides up to 10 hours of protection from mosquitoes and biting flies: gnats, sand flies, stable flies, black flies. Also repels ticks, chiggers and fleas from treated skin.

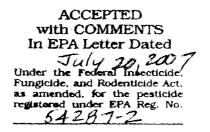
ACTIVE INGREDIENT:

Keep Out of Reach of Children WARNING

See back panel for additional precautionary statements.

Net Weight fl. oz.

[] indicates alternate text.



34

SUPER GUARD INSECT REPELLENT – FINAL

PAGE 2 of 2

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 just enough repellent to cover exposed skin and/or clothing. Avoid over-application of this product. Do not use under clothing. Do not spray [squirt] directly on face. If used on the face, spray [squirt] on hands first and then apply sparingly and avoid the eyes. Do not apply near eyes and mouth. Apply sparingly around ears. Do not apply to children's hands. Frequent reapplication and saturation is unnecessary for effectiveness. For ticks and chiggers, also apply to shoe tops, socks and around openings in clothing. After returning indoors, wash treated skin with soap and water. Wash treated clothing before wearing it again. Avoid contact with plastics such as eyeglass frames and such fabric as acetate and rayon. [Will not damage cotton, wool, or nylon.][Do not apply on or near acetate, rayon, spandex, or other synthetics, furniture, plastics, watch crystals, leather and painted or varnished surfaces including automobiles.]

STORAGE AND DISPOSAL

Storage: Store in a cool, dry place inaccessible to children. **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.

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

WARNING: Causes substantial but temporary eye injury. Do not get in eyes. Harmful if swallowed. Do not spray [squirt] in enclosed areas. Do not apply over cuts, wounds or irritated skin. When using on children, apply to your own hands and then put it on the child. Do not allow children to handle this product. 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.

FIRST AID

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 do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person.
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, continue rinsing the eye. Call a poison control center or doctor for treatment advice.
Have product container with you when calling for help or going for treatment. Ouestions 222: 800-940-4464 Weekdays from 9-5 FST	

Questions ???: 800-940-4464, Weekdays from 9-5 EST.

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

ASSOCIATED REGISTRATIONS, INC., P.O. Box 188, Safety Harbor, FL 34695 EPA Reg. No. 54287-2 EPA Est. 58188-FL-1 54287-2REVISEDED/AL20007