

54287-2

11/24/2008

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460-0001OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

November 24, 2008

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

**Subject: Revised Labeling, Resubmission in Response to Agency Letter Dated September 8, 2008
SUPER GUARD INSECT REPELLENT, EPA Registration No. 54287-2
Your E-Mail Resubmission Dated November 24, 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.

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.

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. In addition, 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.

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

A handwritten signature in black ink, appearing to read "Carmen J. Rodia, Jr.", written over a faint, larger signature.

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

Enclosure: Copy of label stamped "Accepted"

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**SUPER GUARD
INSECT
REPELLENT**

~ 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) encephalitis
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:

| | |
|------------------------|---------|
| DEET..... | 98.11% |
| OTHER INGREDIENTS..... | 1.89% |
| TOTAL | 100.00% |

**Keep Out of Reach of Children
WARNING**
See back panel for additional precautionary statements.

Net [Contents][Weight] _____ fl. oz.

Lot Number: _____

[] indicates alternate text.

ACCEPTED
November 24, 2008
Under the Federal Insecticide, Fungicide,
and Rodenticide Act, as amended, for the
pesticide registered under:

EPA. Reg. No: 54287-2

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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 [squirt] in enclosed areas. Avoid breathing a spray product and **DO NOT** use it near food. Spray and spread evenly with your hand to moisten all exposed skin. 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 onto face. If used on the face, spray [squirt] on palm of hands first and then apply sparingly to face. **DO NOT** apply near eyes and mouth. Apply sparingly around ears. **DO NOT** apply over cuts, wounds or irritated skin. Apply to clothing such as shirts, pants, hat and socks. For ticks and chiggers also apply to shirt, pant cuffs, socks, shoe tops and around other openings in outer clothing. After returning indoors, wash treated skin with soap and water or bathe. Wash treated clothing before wearing it again. **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. **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 repellent product with you.** NOTE: 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)."

STORAGE AND DISPOSAL

Pesticide Storage: Store this product in a cool, dry place that is inaccessible to children. **Pesticide Disposal: If empty:** Nonrefillable container. Do not reuse or refill this container. 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. Wash hands thoroughly with soap and water after handling and 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, then continue rinsing. • 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. For additional information on this pesticide product (including health concerns, medical emergencies or pesticide incidents), you may call 1-800-940-4464, Monday through Friday, 9 a.m. to 5 p.m. EST. After 5 p.m., call your poison control center.</p> | |
| <p>NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.</p> | |

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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