

MAY 10 1990

Associated Registrations
P.O. Box 1308
Safety Harbor, FL 34695

Dear Jean Wendt

Subject: Insect Guard
EPA Reg. No. 54287-6
Application dated March 19, 1990

The proposed amendment to the registration of the product cited above under the Federal Insecticide Fungicide and Rodenticide Act removing the active ingredient, MGK R-11, and increasing the amount of another active ingredient is acceptable subject to the comments listed below. A stamped copy of the label is enclosed for your records.

- 1) Provide the chemical identity of all components of the ingredient, "BRIG 700." The information should include Chemical Abstract Numbers, Material Safety Data Sheet and name of manufacturer.
- 2) The Confidential Statement of Formula (CSF) dated March 12, 1990 is not complete. All items must be completed. If there is no flash point or if pH is not applicable mark NA in the appropriate block. Be sure to provide the upper and lower certified limits for each active ingredient in pure active form and for each individually added inert ingredient. Note the lower limit of the active ingredients must be the same as the amount claimed on the label. Submit a corrected CSF.
- 3) Based on the the current CSF dated March 12, 1990 your product will not meet the label claim. The MGK concentrate you are using for DEKT is 95% N,N-Diethyl-m-toluamide and 5% other isomers. This would yield 19% N,N-Diethyl-m-toluamide and 1% other isomers in your product. Using the plus or minus 3%

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CONCURRENCES

SYMBOL	H7505C						
SURNAME	Tavano						
DATE	5/8/90						

method as indicated in the CSF the percentages for the label would be lower. For the ingredient N-octyl bicycloheptene dicarboximide using the plus or minus 3%, the percentage for the label would be 4.85%.

- 4) Delete the term "General Classification."
- 5) The ingredient statement must contain the full chemical names for the active ingredients as follows:
 - N,N-diethyl-m-toluamide
 - other isomers
 - N-octyl bicycloheptene dicarboximide
- 6) Add "Harmful if swallowed" to the precautionary labeling.
- 7) The statement "Keep Out of Reach of Children" must appear directly above the signal word "Caution."
- 8) Submit a 1 yr storage stability study for the product. The formulated product must be analyzed for its active ingredient at time zero and during a year of storage. The storage should be under warehouse conditions of temperature and humidity using containers similar to those that will be used in the trade. This data must be submitted within 15 months of the date of this letter.

Submit five (5) copies of the corrected finished label.

Sincerely yours,



Phil Hutton
Product Manager (17)
Insecticide-Rodenticide Branch
Registration Division (H7505C)

INSECT GUARD
OUTDOOR CREAM

Repels Mosquitoes, Chiggers, Ticks, Deer Flies, Stable Flies,
Black Flies, Gnats and Fleas on Exposed Skin Surfaces.

NET CONTENTS 2 OZ.

Precautionary Statement
Hazards to Humans and domestic Animals

CAUTION:

KEEP OUT OF REACH OF CHILDREN AND INFANTS

Instruct older children in the proper use of this product.
Do not apply around lips or eyes. In case of contact with
eyes flush with water.

Physical Hazards

Do not use or store near heat or open flame.

DIRECTIONS FOR USE:

Apply liberally to all exposed skin areas. To protect face,
apply to hands and rub on. Repeat as needed. For ticks and
chiggers, also apply liberally to shoe tops, socks, and
around openings in clothing. Avoid contact with plastics,
such as eyeglass frames and such fabric as acetate and rayon.

STORAGE AND DISPOSAL:

Storage: Store 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.

GENERAL CLASSIFICATION:

It is a violation of Federal law to use this product in a
manner inconsistent with its labeling.

ACTIVE INGREDIENTS:

N,N- diethyl-meta toluamide	19.125%
Other	0.875%
*N-octyl	5.000%
INERT INGREDIENTS:	75.000%
TOTAL	100.000%

*MCK-264, Insecticide Synergist

EPA Reg. NO. 54287-6
EPA Est. No. 54287-FL-01

ASSOCIATED REGISTRATIONS

Safety Harbor, FL 34695

ACCEPTED
with COMMENTS
in EPA Letter Dated:

MAY 10 1990

Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
Registration No. 54287-6

54287-6