

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



OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

December 2, 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/Rebuttal in Response to Agency Letter Dated July 16, 2008
INSECT GUARD 3023 INSECT REPELLENT, EPA Registration No. 54287-22
Your Resubmission Dated August 28, 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):

Storage & Disposal section comment(s):

1. To facilitate inclusion of language from PR Notice 2007-4, replace this section with: "**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 for disposal instructions. Never place unused product down any indoor or outdoor drain."

First Aid Statement section comment(s):

2. Revise the 3rd row of this statement to read: "Have the product container or label with you when calling a poison control center or going for treatment. For additional information on this 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."

Optional Marketing (Language) Claims section comment(s):

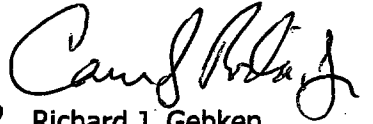
3. Delete the optional marketing claim "***Ideal for the pocket, purse, pack, backpack, beach bag, travel bag, tackle box, fly jacket.***" or clarify that the product is ideal for carrying in the pocket, pack, backpack, etc. Without this clarification, a purchaser could assume that the product can be applied inside the pocket, purse, pack or backpack.

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.

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,



FOR

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

Enclosure: Copy of label stamped "Accepted with Comments"

054287-00022 D400014

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**INSECT GUARD 3023
INSECT REPELLENT**

~ OPTIONAL MARKETING LANGUAGE, SYMBOLS & GRAPHICS: SEE LAST PAGE ~

ACTIVE INGREDIENT:

Picaridin, 1-Methylpropyl-2-(2-hydroxyethyl)-1-piperidine carboxylate..... 20%

OTHER INGREDIENTS:..... 80%

TOTAL: 100%

**Keep Out of Reach of Children
CAUTION**
See back panel for additional precautionary statements.
[See (inside)(back) panel for precautions.]

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

[] indicates alternate text.

**ACCEPTED
With COMMENTS
In EPA Letter Dated:**
December 2, 2008
Under the Federal Insecticide, Fungicide
and Rodenticide Act, As amended, for the
pesticide Registered under EPA Reg. No:
54287-22

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Repels listed insects and ticks for up to eight hours. Hold 4 to 6 inches away from skin while spraying, keeping nozzle pointed away from face. Use just enough repellent to cover exposed skin. Avoid over-application of this product. Do not apply to the hands of small children. Do not use under clothing. Do not spray directly on face. Apply on face by first spraying small amounts in palms of hands and spreading on face and neck. Do not apply near eyes or mouth. Apply sparingly around ears. Frequent reapplication and saturation is unnecessary for effectiveness. Avoid contact with lips, cuts, wounds, or irritated skin. Do not apply to excessively sunburned skin. Reapply every 8 hours. Do not exceed two applications per day.

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 for disposal instructions. Never place unused product down any indoor or outdoor drain.

PRECAUTIONARY STATEMENTS

Hazards to Humans

CAUTION: Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling, returning indoors, and before eating, drinking, chewing gum, or using tobacco.

PHYSICAL HAZARDS

Combustible. Do not use or store near heat or open flame.

FIRST AID

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 the eye. • Call a poison control center or doctor for treatment advice.
If Swallowed:	<ul style="list-style-type: none"> • Call a physician or poison control center for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by a Poison Control Center or a doctor. • Do not give anything to an unconscious person.
<p>Have 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>	

ASSOCIATED REGISTRATIONS, INC., P.O. Box 188; Safety Harbor, FL 34695
 EPA Reg. No. 54287- 22 EPA Est. 58188-FL-1

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~ OPTIONAL LANGUAGE ~

Repels insects and ticks for up to eight hours.

Up to 8 Hours Protection from mosquitoes, ticks, biting flies, gnats, chiggers and fleas.

Long-lasting, effective protection from mosquitoes, ticks, biting flies, gnats, chiggers and fleas.

Use with confidence on the whole family.

And your family will want to use it, too. It smells great, too!

Non-oily

Non-greasy

Non-sticky

Insect Repellent

Spray Pump (Spray)

Repels Mosquitoes

Fisherman's [Angler's] Formula

Will [Does] Not Damage Fishing Lines or [Other] Synthetic Materials

Will [Does] not harm gear and equipment

Will [Does] not harm plastics and fabric

Odorless

Odorless after application

220+Sprays

Also Repels Biting Flies, Gnats, Chiggers, Ticks & Fleas

(Patent Pending) Combo-Clip™ with key ring hole

Insect Repellent Spray

Personal Pocket Size

Compact, portable, convenient

Clips anywhere, hangs anywhere

6/7

~~Ideal for the pocket, purse, pack, backpack, beach bag, travel bag, tackle box, fly jacket~~

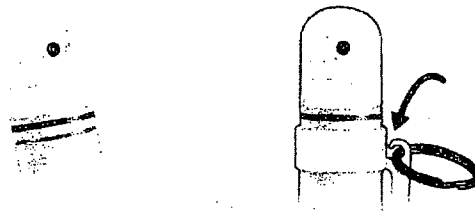
If you're going to go... GoReady

Goes anywhere

Combo-Clip™ Hangs or Clips

Hang it! Snap in carabiner rings, lanyards, key rings, etc... or Clip it! in [a] pocket, purse, or pack

The following graphics and symbols have been added:



with
**SAWYER
20%
PICARIDIN**

**GoREADY
INSECT REPELLENT**

SPRAY

Active ingredient: Picaridin (20%)
KEEP OUT OF REACH OF CHILDREN
CAUTION See inside Panel for Precautions and Directions
EPA Reg. No. 54287-22-84176
EPA Est. No. 58188-FL-162
79533-WI-162 81203-MA-162
44446-TX-162
Certified letters are first letters of lot number.

220+
Hours

**GoREADY
INSECT REPELLENT**

with
**SAWYER
20%
PICARIDIN**

**GoREADY
INSECT REPELLENT**

SPRAY

WILL NOT damage fishing lines or synthetic materials

Up to 8 Hrs Protection from Mosquitoes, Ticks, Biting Flies, Gnats, Chiggers & Fleas

Combo-Clip: hang or clips

PERSONAL POCKET SIZE

NET WT. 5.6 FL. OZ. (160 mL)

with Sawyer® 20% Picaridin

**GoREADY
INSECT REPELLENT**

Potential Pending
Combo-Clip.

Hang it!
Snap in carabiner rings, leashes, key rings, etc.

or Clip it!
In a pocket, purse, or pack

If you're going to go... **GoReady.**

- WILL NOT** damage fishing lines or synthetic materials
- Up to 8 Hours Protection from Mosquitoes, Ticks, Biting Flies, Gnats, Chiggers & Fleas**

Directions: It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Repeat listed insects and ticks for up to eight hours. Hold 4 to 6 inches away from skin while spraying. Keeping nozzle pointed away from face. Use just enough repellent to cover exposed skin. Avoid over application of this product. Do not apply to the hands of small children. Do not use while driving. Do not spray directly on face. Apply on face by first spraying small amounts in palms of hands and spreading on face and neck. Do not apply near eyes or mouth. Apply sparingly around ears. Frequent reapplication and saturation is unnecessary for effectiveness. Avoid contact with lips, cuts, wounds, or irritated skin. Do not apply to excessively sunburned skin. Reapply every 8 hours. Do not exceed two applications per day.

Storage: Store in a cool, dry place accessible to children if empty. Do not reuse the container. Place in trash or offer for recycling if available. If empty: Call your local solid waste agency for disposal instructions. Never place unused product down any drain or outdoor area.

Precautions: **Hazards to Humans: CAUTION:** Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling, returning indoors, and before eating, drinking, chewing gum, or using tobacco. **PHYSICAL HAZARDS:** Flammable. Keep away from heat, sparks and open flame.

First Aid: 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, then continue rinsing the eye. Call a poison control center or doctor for treatment advice if swallowed. Call a physician or poison control center for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a Poison Control Center or a doctor. Do not give anything to an unconscious person. Have product container or label with you when calling a poison control center or doctor or going for treatment. Questions ??? 800-586-9469, Weekdays from 8-5 MST.

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, then continue rinsing the eye.
- Call a poison control center or doctor for treatment advice.
- Call a physician or poison control center for treatment advice.

IF SWALLOWED:

- Have person sip a glass of water if able to swallow.
- Do not induce vomiting, unless told to do so by a Poison Control Center or a doctor.
- Do not give anything to an unconscious person.
- Have product container or label with you when calling a poison control center or doctor or going for treatment.
- Questions ??? 800-586-9469, Weekdays from 8-5 MST.

Made in the USA for Natural Trends, LLC, 63 North 400 West, Provo, UT 84601
Questions or Comments? 1-800-586-9469 or visit us at www.GoReady.com
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EPA Reg. No. 54287-22-84176 EPA Est. No. 58188-FL-162 79533-WI-162 81203-MA-162 44446-TX-162
Certified letters are first letters of lot number.

8 96650 00021 3

DIRECTIONS FOR USE: It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Repeat listed insects and ticks for up to eight hours. Hold 4 to 6 inches away from skin while spraying. Keeping nozzle pointed away from face. Use just enough repellent to cover exposed skin. Avoid over application of this product. Do not apply to the hands of small children. Do not use under clothing. Do not spray directly on face. Apply on face by first spraying small amounts in palms of hands and spreading on face and neck. Do not apply near eyes or mouth. Apply sparingly around ears. Frequent reapplication and saturation is unnecessary for effectiveness. Avoid contact with lips, cuts, wounds, or irritated skin. Do not apply to excessively sunburned skin. Reapply every 8 hours. Do not exceed two applications per day.

STORAGE AND DISPOSAL: Storage: Store in a cool, dry place accessible to children if empty. Do not reuse the container. Place in trash or offer for recycling if available. If empty: Call your local solid waste agency for disposal instructions. Never place unused product down any drain or outdoor area.

EPA Reg. No. 54287-22-84176
EPA Est. No. 58188-FL-162
79533-WI-162 81203-MA-162
44446-TX-162
Certified letters are first letters of lot number.

with
**SAWYER
20%
PICARIDIN**

**GoREADY
INSECT REPELLENT**

SPRAY

Active ingredient: Picaridin (20%)
KEEP OUT OF REACH OF CHILDREN
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79533-WI-162 81203-MA-162
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PRECAUTIONARY STATEMENTS: Hazards to Humans: CAUTION: Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling, returning indoors, and before eating, drinking, chewing gum, or using tobacco. **PHYSICAL HAZARDS:** Flammable. Keep away from heat, sparks and open flame.

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