

NOV 13 1991

Mr. Edward H. Grout  
Tender Corporation  
P.O. Box 290  
Littleton Industrial Park  
Littleton, NH 03561

Dear Mr. Grout:

Subject: Amended Label, DEET L.I.P.  
Ben's 100, EPA Reg. No. 56575-7  
Ben's Backyard Formula, EPA Reg. No. 56575-9  
Submission dated October 30, 1991

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable. A stamped copy is enclosed for your records.

As new labels are prepared, delete the word "liberally" in the label Directions for Use for EPA Reg. No. 56575-9; this instruction is inconsistent with the precautions of avoiding overexposure and saturation when applying the product.

While we appreciate your attentiveness in modifying the label for the subregistration EPA Reg. No. 11715-85-56575, it is the responsibility of the original registrant, Speer Products Inc., to amend the label.

Sincerely,

RFM

Richard F. Mountfort  
Product Manager (10)  
Insecticide-Rodenticide Branch  
Registration Division (H7505C)

C. J. S. 2  
10-29-91

**PRECAUTIONARY STATEMENTS  
& HAZARDS TO HUMANS—CAUTION**

Do not apply over cuts, wounds, or irritated skin. May cause eye irritation. Do not let children rub their eyes if hands have been treated. Do not expose treated skin or clothing to fire, sparks or flame until liquid has evaporated. Wash skin and/or clothing with soap and water after use. May cause skin reactions in rare cases. If you suspect a reaction, wash area and call local poison control center. ~~Take this bottle with you if you go to a doctor.~~ Harmful if swallowed.

**STATEMENT OF PRACTICAL TREATMENT**  
If in eyes: Flush with plenty of water. Get medical attention. If swallowed: Call a Doctor 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 unconscious person.

**PHYSICAL HAZARDS**  
Flammable. Do not use or store near heat or open flame.

**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.

A portion of this purchase will be given to the Tender Corporation Environmental Donation Fund. For more information, write Jayne, TENDER CORPORATION, P.O. Box 290, Littleton, NH 03561

**Ben's®**

*backyard  
formula*

**TICK and INSECT  
REPELLENT**

**REPELS** Black Flies, Ticks, Mosquitoes, Chiggers, Deer Flies, and Stable Flies.

**ACTIVE INGREDIENTS:**

N,N-diethyl-m-toluamide	23.75%
Other Isomers	1.25%
N-Octyl bicycloheptene dicarboximide	5.00%
Di-n-propyl isocinchomeronate	2.50%
<b>INERT INGREDIENTS:</b>	<b>67.50%</b>

**KEEP OUT OF REACH OF CHILDREN  
CAUTION**

See Back Panel for Additional Precautionary Statements  
Net Contents: 4 liquid oz.

**DIRECTIONS FOR USE  
READ ALL DIRECTIONS BEFORE USING  
THIS PRODUCT.**

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

Spray on all exposed skin areas, keeping nozzle pointed away from face. Do not inhale. Use just enough to cover exposed skin and/or clothing. Do not use under clothing. Avoid frequent application and saturation. Do not spray directly on face or in enclosed areas. To apply to face, spray on hands and rub on. Do not apply to eyes and mouth, or to the hands of young children. Repeat as needed.

For ticks and chiggers, apply liberally to shoe tops, socks, and around openings in clothing. Keep off synthetics, plastics, furniture, and paints. May damage leather.



**Tender**

TENDER CORP.  
LITTLETON, NH U.S.A.  
EPA REG NO. 56575-9  
EPA EST. NO. 56575-NH-001

**ACCEPTED  
with COMMENTS  
in EPA Letter Dated**

**NOV 13 1991**

**Under the Federal Insecticide,  
Fungicide, and Rodenticide  
as amended, for the pest  
registered under EPA Reg.**

**56575-9**

**BEST AVAILABLE COPY**

E.D.S. 2  
10-30-91

**PRECAUTIONARY STATEMENTS  
& HAZARDS TO HUMANS- CAUTION**

Do not apply over cuts, wounds, or irritated skin. May cause eye irritation. Do not let children rub their eyes if hands have been treated. Do not expose treated skin or clothing to fire, sparks or flame until liquid has evaporated. Wash skin and/or clothing with soap and water after use. May cause skin reactions in rare cases: if you suspect a reaction, wash area and call local poison control center. ~~Take this bottle with you if you go to a doctor.~~ Harmful if swallowed.

**STATEMENT OF PRACTICAL TREATMENT**

If in eyes: Flush with plenty of water. Get medical attention. If swallowed: Call a Doctor 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 unconscious person.

**PHYSICAL HAZARDS**

Flammable: Do not use or store near heat or open flame.

**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.

A portion of this purchase will be given to the Tender Corporation Environmental Donation Fund. For more information, write Jayne, TENDER CORPORATION, P.O. Box 290, Littleton, NH 03561

For complete outdoor protection, try Tender's other products like Ben's Wilderness formula - mid range insect protection; Natrapel<sup>®</sup> or a Deet free, natural repellent. When bugs strike first, get instant relief with After Bite<sup>®</sup>. For hunting or fishing in heavy bug country, try Ben's Max lotion, 100% Deet or Bug Armor insect repellent clothing.

**Ben's<sup>®</sup>**

*backyard  
formula*

**TICK AND INSECT  
REPELLENT ECO-SPRAY<sup>®</sup>**

**REPELS:** Black Flies, Ticks, Mosquitoes, Chiggers, Deer Flies, and Stable Flies.

**ACTIVE INGREDIENTS:**

N,N-diethyl-m-toluamide	23.75%
Other Isomers	1.25%
N-Octyl bicycloheptene dicarboximide	5.00%
Di-n-propyl isocinchomeronate	2.50%
<b>INERT INGREDIENTS:</b>	<b>87.50%</b>
<b>TOTAL</b>	<b>100.00%</b>

**KEEP OUT OF REACH OF CHILDREN**

**CAUTION**

See Back Panel for Additional Precautionary Statements

Net Contents: 5 liquid oz.

**DIRECTIONS FOR USE**

**READ ALL DIRECTIONS BEFORE USING THIS PRODUCT.**

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

Spray on all exposed skin areas, keeping nozzle pointed away from face. Do not inhale. Use just enough to cover exposed skin and/or clothing. Do not use under clothing. Avoid frequent application and saturation. Do not spray directly on face or in enclosed areas. To apply to face, spray on hands and rub on. Do not apply to eyes and mouth, or to the hands of young children. Repeat as needed.

For ticks and chiggers, apply liberally to shoe tops, socks, and around openings in clothing. Keep off synthetics, plastics, furniture, and paints. May damage leather.



\*This Eco-Spray bottle uses a patented mechanical delivery system to create an aerosol-like spray.



**TENDER**  
TENDER CORP.  
LITTLETON, NH U.S.A.  
EPA REG. NO. 56575-8  
EPA EST. NO. 56575-NH-001

**ACCEPTED  
with COMMENTS  
in EPA Letter Dated**

NOV 13 1991

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act  
as amended, for the pesticide  
registered under EPA Reg. No.

56575-9

**BEST AVAILABLE COPY**