

22 APR 1994

Tender Corporation
c/o Ms. Kim Davis
RegWest Company
P.O. Box 2220
Greeley, CO 80632-2220

Dear Ms. Davis:

Subject: Change in Toxicity Category from **CAUTION** to **WARNING**
Ben's Backyard Formula Tick and Insect Repellent
EPA Registration Number 56575-9
Submission Dated March 11, 1994

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments listed below. Three (3) copies of the finished labeling must be submitted prior to releasing the product for shipment. A stamped copy of the product label is enclosed for your records.

1. Delete the following text from the **PRECAUTIONARY STATEMENTS** section: May cause eye irritation.
2. Incorporate the following text into the **PRECAUTIONARY STATEMENTS** section of the product label: Causes substantial but temporary eye injury. Do not get in eyes or on clothing.
3. Revise the **If in Eyes** and **If Swallowed** sections of the product label to appear as follows:

If in Eyes: Hold eyelids open and flush with a steady stream of water for 15 minutes. Get medical attention if irritation persists.

If Swallowed: Drink promptly a large quantity of milk, egg white, gelatin solution, or if these are not available, large quantities of water. Avoid alcohol. Do not give anything by mouth to an unconscious person. Get medical attention.

Sincerely,



Mr. Robert S. Brennis

Acting Product Manager TO

CONCURRENCES

MSOL	SURNAME	DATE	Insecticide-Rodenticide Branch				
			Registration Division				

FRONT PANEL

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%
INERT INGREDIENTS:	67.50%

ACCEPTED
with COMMENTS
by EPA Letter Dated

22 APR 1994

Keep Out of Reach of Children

WARNING

See back panel for additional precautionary statements.

Net Contents: _____ liquid oz.

BACK PANEL

DIRECTIONS FOR USE

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

READ ALL DIRECTIONS BEFORE USING THIS PRODUCT

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

STORAGE AND DISPOSAL

STORAGE: Store in a cool, dry area away from heat or open flame. **DISPOSAL:** Do not reuse empty container. Wrap container and put in trash collection.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

WARNING: 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. 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 or Chemical Hazards

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

EPA Reg. No. 56575-9

EPA Est. 56575-NH-1

TENDER CORP.

P.O. Box 290; Littleton, NH 03561

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.

03/94

BEST AVAILABLE COPY