



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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

July 18, 2008

Ms. Olivia D. Laird,
Agent/Consultant for Tender Corporation
c/o Laird's Regulatory Consultants, Inc.
17804 Braemar Place
Leesburg, VA 20175-7046

**Subject: Re-Review of Revised Labeling
Ben's® Tick & Insect Repellent Wipes, EPA Reg. No. 56575-13
Your Submission Dated January 22, 2008**

Dear Ms. Laird:

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):

General Statement:

1. Delete all text throughout the label marked with "strikethrough."

Directions for Use section comment(s):

2. Replace the last sentence from this section with: "NOTE: 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 section comment(s):

3. Relocate the Storage and Disposal section to appear on the label immediately following the First Aid section and replace the "Pesticide Disposal:" subsection with: "Disposal: Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available."

Precautionary Statements, Hazards to Humans and Domestic Animals section comment(s):

4. Insert the signal word "**WARNING**" immediately following the section title.
5. Relocate this section to appear on the label immediately preceding the Directions for Use section.

First Aid Statement (table) comment(s):

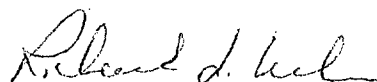
6. Replace the 2nd sentence starting with "For more information ..." with: "For more information on this pesticide product (including health concerns, medical emergencies or pesticide incidents), you may call 1-800-xxx-xxxx." ¹

¹ Please note that the "1-800-xxx-xxxx" must be substituted with a valid phone number that is available twenty-four (24) hours per day, seven (7) days per week for answering and responding to any medical emergencies or health concerns.

2 7 5

Tender Corporation should note that 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.

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. A copy of your label for this product stamped "Accepted with Comments" is enclosed for your records. If you have any questions, please contact Mr. Carmen Rodia at (703) 306-0327 or via e-mail at Rodia.Carmen@epa.gov.



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

Enclosure: Label stamped "Accepted with Comments"

056575-00013 D389682

FRONT COPY**Ben's® [logo] Tick & Insect Repellent Wipes****30% DEET TICK & INSECT REPELLENT [circle and bar copy]**

Repels insects that may carry West Nile Virus ~~and other biting insect~~
Easy to Use, Easy to Carry!

Active Ingredient:

DEET* 30%

Other Ingredients: ...70%

Total.....100%

*(CAS No. 134-62-3)

Keep out of reach of children

WARNING: See back panel for additional precautionary statements.

Net Weight: 0.12 fluid oz each

Total Net Weight 1.44 fluid oz

SIDE PANELS**BEN'S [logo] Tick & Insect Repellent Wipes****On right side panel include –****EPA Est. 56575-NH-1****EPA Reg. No. 56575-13**

ACCEPTED
with COMMENTS
In EPA Letter Dated
July 18, 2008
Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
56575-13

Ben's 30 wipes box

BACK COPY

Don't Get Bitten – Get Ben's®

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. Tear open sachet near notched end. Remove and unfold wipe (towelette). Repellents should be applied only to exposed skin as directed on this product label. Do not use under clothing. Use just enough of this product to cover exposed skin. Heavy application and saturation is unnecessary for effectiveness. If biting insects do not respond to a thin film of repellent, apply a bit more. Do not apply near eyes and mouth, and apply sparingly around ears. Do not allow children to handle this product, and do not apply to children's hands. When using on children, apply product to your child yourself. Instruct older children in the proper use of this product. Do not apply more than 3 times per day to children ages twelve (12) and under. Reapply as necessary or after swimming or showering. Apply this product second if used in conjunction with a sunscreen product. After returning indoors, wash treated skin with soap and water or bathe. This is particularly important when repellents are used repeatedly in a day or on consecutive days. Also, wash treated clothing before wearing it again. **NOTE:** Do not apply on or near acetate, rayon, Spandex or other synthetic fabrics, nylon furniture, plastics (such as eyeglasses and watch crystals), leather and painted or varnished surfaces (including automobiles).

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal. **Pesticide**

Storage: Store this product in a cool and dry (preferably locked) area

inaccessible to children or pets and away from heat or open flame. **Pesticide**

Disposal: If partly filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain. **If empty:** Do not reuse this container. Place in trash or offer for recycling if available.

PRECAUTIONARY STATEMENTS

WARNING → Hazards to Humans and Domestic Animals

Never use repellents over cuts, wounds or irritated skin. Causes substantial but temporary eye injury. Do not get in eyes. Do not apply to children's hands. Do not use on infants. Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse. 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.

First Aid**If in Eyes:**

- Hold eye open and rinse slowly with water for 15-20 minutes
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye
- Call a poison control center or doctor for treatment advice

If Swallowed:

- Immediately call a poison control center or doctor for treatment advice
- Have person sip a glass of water, if unable to swallow
- Do not induce vomiting unless told to do so by a poison control center or doctor
- Do not give anything by mouth to an unconscious person

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 the National Pesticide Information Center at 1-800-858-7378.

Note to Physician: Probable mucosal damage may contraindicate the use of gastric lavage.

02-2220-1

Tender Corp [logo]

106 Burndy Rd, Littleton NH 03561

Questions? Call 1-800-258-4696

UPC 044224070852