PM 10

09 APR 1992

Karen Shrader Triton Consumer Products, Inc. 561 W. Golf Road Arlington Heights, IL 60005

Dear Ms. Shrader:

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Subject: Response to PR Notice 91-4 (DEET LIP) and PRN 91-7 Skeeter Stop 100 EPA Rey. No. 62424-1 Submission: March 25, 1992

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as cmended, is acceptable subject to the comments listed below. One copy of the finished labeling must be submitted prior to releasing the product for shipment.

- 1) Remove the name "DEET" from the Active ingredient statement.
- 2) Remove the word "Concentrated" from the front label. Concentrated seems to indicate that the product needs to be diluted.

Although we still incourage inclusion, we have determined that it is acceptable to exclude the statement from your label, "If you go to a doctor, take this repellant with you". You do not need to submit an amendment to remove this from your label.

We have accepted this label with the assumption that all back label language will be on the bottle. In your conversation with Bob Brennis on April 9, you indicated it may be necessary to reduce the language on the back label and, instead, include it on a blister card. Some items (such as EPA Reg. No. and Precautionary Statements) could be shifted to the front label. We ask that as much of the human warning statements and label improvement statements be included on the bottle as is possible. Please indicate clearly in any resubmission, which language is intended for the label on the bottle and which language for the blister pack.

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If you have any further questions, you may reach me at 703-305-6502, or Bob Brennis at 703-305-6788.

Sincerely,

Rfm

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

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Principal Display Panel

SKEETER STOP 100

100% Concentrated Deet Formula MAXIMUM STRENGTH INSECT REPELLENT ACCEPTENTS with COMMENTS In EPA Lawer Doed In EPA Lawer Doed In eracher APR 1992 In erac

ACTIVE INGREDJENTS: N, N-diethyl-m-toluamide (Deet) 95% OTHER ISOMERS 5%

NET CONTENTS 1 Fl. Oz. (30 ml.)

WARNING: For external use only. Keep out of reach of children. See back panel for other precaution.

(over for back panel)

Back Panel

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Protects against mosquitos, biting flies, fleas, ticks, gnats & chiggers

READ ALL DIRECTIONS BEFORE USING THIS DIRECTIONS FOR USE: PRODUCT. It is a violation of Federal Law to use the product in a manner inconsistent with its labeling. Squeeze several drops into hands and apply to exposed skin. Apply to socks, shoe tops and openings in outer clothing to repel chiggers, ticks and fleas. Do not apply over cuts, wounds, sunburned or irritated skin. Do not apply to eyes and mouth and do not apply to the hands of young children. Do not spray directly on face. Use just enough repellent to cover exposed skin and/or clothing. Do not use under clothing. Avoid overexposure. Frequent reapplication and saturation is unnecessary for effectiveness. After returning indoors, wash treated skin with soap and water. Wash treated clothing. Use of this product may cause skin reactions in rare cases. If you suspect that you or your child is reacting to this product, wash treated skin and call your local poison control center. If you go to a doctor, take this repellent with you.

Do not use on acetate, rayon and dynel. May damage furniture finishes, plastic and painted surfaces.

PRECAUTIONARY STATEMENTS: WARNING: Hazards to humans and domestic animals. Keep out of reach of children. Instruct older children in the proper use of this product. Harmful if swallowed. Avoid contact with eyes and lips. May cause eye injury.

STATEMENT OF PRACTICAL TREATMENT: IF IN EYES: Flush with plenty of water and get medical attention. IF SWALLOWED: Drink 1 or 2 glasses of water and induce vomiting by couching 1 ck of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person. Get medical attention.

PHYSICAL OR CHEMICAL HAZARD: FLAMMABLE: Keep away from heat or open flame.

STORAGE AND DISPOSAL: 1 ore in a cool dry place. Do not reuse empty container. Wrap container and put in trash.

EPA Registration No. 62424-1 EPA Est. No. 50757-WI-01

DISTRIBUTED BY: Triton Consumer Products, Inc. Arlington Heights, IL 60005