



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

October 23, 2018

Walter Talarek, PC
WEICHEM, INC.
5153 Allison Marshall Dr
Warrenton VA 20187-8980

Subject: Label Amendment – Adding an alternate brand name and marketing claims
Product Name: FIREBUG INSECT REPELLENT SPRAY
EPA Registration Number: 34370-2
Application Date: 07/19/2018
Decision Number: 543040

Dear Mr. Talarek:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6. If you have any questions, please contact Helen Hull-Sanders by phone at 703-347-0243, or via email at hull-sanders.helen@epa.gov.

Page 2 of 2
EPA Reg. No. 34370-2
Decision No. 543040

The alternate brand name EXTREME INSECT REPELLENT has been added to the product record.

Sincerely,

A handwritten signature in black ink, appearing to read "Elizabeth Fertich". The signature is written in a cursive, flowing style.

Elizabeth Fertich
Product Manager 04
Invertebrate & Vertebrate Branch 1
Registration Division (7505P)
Office of Pesticide Programs

Enclosure

Text in braces { } is explanatory or informational and will not appear on the labeling
Text in brackets [] is optional and may or may not appear on the labeling
Text in parentheses () will appear on the labeling

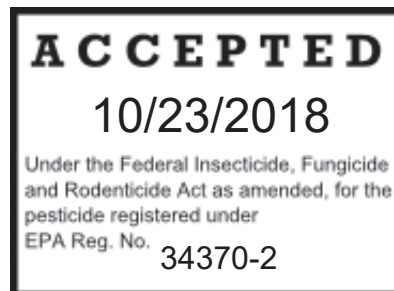


Rev. 10/9/18

{Language for Front Panel of Label for Container and Peel Back Label}

FIREBUG INSECT REPELLENT SPRAY

- [ABN: BUZZ UP INSECT REPELLENT SPRAY]
- [ABN: FIREBUG™]
- [ABN: FIREBUG ALL-FAMILY INSECT REPELLENT SPRAY]
- [ABN: FIREBUG INSECT REPELLENT]
- [ABN: FIREBUG MOSQUITO & TICK REPELLENT]
- [FIREBUG TICK AND INSECT REPELLENT]
- [ABN: EXTREME INSECT REPELLENT]



[Insect Repellent Spray] [All-Family Insect Repellent Spray] [Tick and Insect Repellent] [Mosquito & Tick Repellent]
{if applicable} [Continuous Spray] [Pump Spray]
[Long-lasting Effective 12 hour Mosquito [& Tick] Protection]

ACTIVE INGREDIENTS:

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

OTHER INGREDIENTS:.....80%

TOTAL 100.0%

[Repels Mosquitoes that may transmit West Nile Virus [For up to 12 hours [of protection]]
[Repels Mosquitoes that may transmit Zika Virus [For up to 12 hours [of protection]]
[Repels Mosquitoes that may transmit Dengue Fever [For up to 12 hours [of protection]]
[Repels Mosquitoes that may spread Zika Virus, West Nile Virus, or Dengue Fever [For up to 12 hours [of protection]]

[And][&] [Repels Ticks that may carry Lyme Disease [For up to 12 hours [of protection]]

[REPELS] Biting flies, stable flies, black flies, gnats, chiggers; [&] sand flies and Scottish biting midges for up to 8 hours.]

[Long-lasting, 12 hour effective protection from mosquitoes]
[including mosquitoes that may be carrying [And] [&] [that may transmit] West Nile Virus.]
[including mosquitoes that may be carrying [And] [&] [that may transmit] Zika Virus.]
[including mosquitoes that may be spreading [And] [&] [that may transmit] =Dengue Fever]
[including mosquitoes that may be spreading [And] [&] [that may transmit] Zika, West Nile Virus, or Dengue Fever]
[including mosquitoes that may be carrying [And] [&] [that may transmit] Chikungunya, Dengue, and Zika]

[Long-lasting, 12 hour effective protection from ticks, including ticks carrying Lyme Disease]

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Rev. 10/9/18

[[Repels] [and protects against] Mosquitoes that may transmit Zika Virus, West Nile Virus, Dengue Fever, Chikungunya and Ticks that may carry Lyme Disease for up to 12 hours.]

KEEP OUT OF REACH OF CHILDREN.

CAUTION: Stop and read this entire label before use.

[See [card] [behind peel back] for additional precautionary statements.]

IN CASE OF EMERGENCY, CALL: 1-800-535-5053

Net Contents: [] [fluid] oz. [] ml

[Pump Spray] {or} [Continuous Spray]

[Contains Picaridin] [www.wechem.com/products/Firebug_Firebug.aspx] {Registrant may insert one or more graphics from page 7}

{Language for Back Panel of Label for Container, Card and Peel Back Label}

PRECAUTIONARY STATEMENTS

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

{Note: First Aid grid format used if market label space permits: otherwise a paragraph format will be used}

FIRST AID

IF IN EYES:

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

IF SWALLOWED:

- Call a physician or poison control center immediately 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 the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-535-5053 for emergency medical information.

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Rev. 10/9/18

STORAGE & DISPOSAL

Pesticide Storage: Store this product in a cool, dry (preferably locked) place, out of reach of children. Keep away from heat, sparks, and open flame.

Pesticide Disposal and Container Handling: Non-refillable container. Do not reuse or refill this container. Do not puncture or incinerate! **If Empty:** 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.

PHYSICAL HAZARDS

FLAMMABLE. Do not use or store near heat sources, sparks or open flame. [{container specific} Contents under pressure do not puncture or incinerate container.] [{container specific} Exposure to temperature above 130°F may cause bursting.] Do not smoke while applying.

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] {or} [all labels and packaging {where size requires peel-back}]. [Remove protective cap.] Hold [can] 4 to 6 inches from skin while spraying, keeping nozzle pointed away from face. Slightly moisten skin or clothing with a slow sweeping motion. **FOR USE ON: [FR] [Flame Resistant] [FRC] [clothing]:** **Allow product to dry for 30 minutes before being exposed to areas of energized equipment.** Use just enough repellent to cover exposed skin and/or clothing. Do not use under clothing. Do not spray directly on face [or enclosed areas]. [Do not inhale.] Do not apply near eyes and mouth. Spray on hands first, and then apply sparingly to face, neck and around ears, avoiding your eyes. Do not apply over cuts, wounds, or irritated skin, and do not apply to excessively sunburned skin. Do not apply to children's hands. Do not allow children to handle this product. When using on children, apply to your own hands and then put it on the child. Excessive amounts or frequent reapplication is unnecessary. Avoid over-application of this product. Do not exceed more than 2 applications per day. Apply sparingly around ears. After returning indoors, wash treated skin with soap and water [and double-check yourself and other family members for ticks.] Wash treated clothing before wearing it again. 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 Poison Control Center. If you go to a doctor, take this product with you.

WARRANTY DISCLAIMER: Buyer assumes all responsibility for safety and use not in accordance with directions.

[EPA Reg. No.: _____] [EPA Est. No.: _____] [Batch Lot No.: _____]

Wechem, Inc. {5734 Susitna Dr.} Harahan, LA 70123 {Registrant may insert one or more graphics from page 7}

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Rev. 10/9/18

{For Very Small Packaging: When container size does not allow a peel back label, product will always be sold attached to a card with the complete "back panel" labeling from above, and these very small sizes will have the following language on the immediate container}

FIREBUG INSECT REPELLENT SPRAY

{Alternate Brand Name may be substituted} [BUZZ UP INSECT REPELLENT SPRAY] [FIREBUG] [FIREBUG INSECT REPELLENT] [FIREBUG ALL-FAMILY INSECT REPELLENT SPRAY] [FIREBUG TICK AND INSECT REPELLENT] [FIREBUG MOSQUITO & TICK REPELLENT] [EXTREME INSECT REPELLENT]

ACTIVE INGREDIENTS:

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

OTHER INGREDIENTS:.....80%

TOTAL 100.0%

KEEP OUT OF REACH OF CHILDREN.

CAUTION: Stop and read all information on card for additional important precautionary statements before use.

Net Contents: [] [fluid] oz. [] ml [Pump Spray] [Continuous Spray]

Wechem, Inc., Harahan, LA 70123

[Questions?] Call 504-733-1152

[EPA Reg. No.: _____] [EPA Est. No.: _____] [Batch Lot No.: _____]

PRECAUTIONARY STATEMENTS

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

FIRST AID: IF IN EYES: · Hold eye open and rinse gently with water for 15-20 minutes · Remove contact lenses, if present, after five minutes, and then continue rinsing. · Call a poison control center or doctor for treatment advice. **IF SWALLOWED:** · Call a physician or poison control center immediately for treatment advice. · Have person sip a glass of water if able to swallow. · Do not induce vomiting unless told to by Poison Control Center or doctor. · Do not give anything to an unconscious person. Have the product container or label with you when calling or going for treatment. You may also contact 1-800-535-5053 for emergency medical information.

STORAGE & DISPOSAL

Pesticide Storage: Store this product in a cool, dry (preferably locked) place, out of reach of children. Keep away from heat, sparks, and open flame.

Pesticide Disposal and Container Handling: Non-refillable container. Do not reuse or refill this container. Do not puncture or incinerate! **If Empty:** 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.

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Rev. 10/9/18

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 all labels and all packaging. [Remove protective cap.] [{Spray delivery} Hold 4 inches from skin while spraying keeping nozzle pointed away from face and slightly moisten area with a slow sweeping motion. Do not spray directly on face, spray on hands first and then rub on face.] Apply sparingly around ears. Do not apply to the hands of small children. Avoid contact with eyes, mouth, cuts, wounds, or irritated skin. Do not apply to excessively sunburned skin. Do not apply under clothing.

WARRANTY DISCLAIMER: Buyer assumes all responsibility for safety and use not in accordance with directions.

{Everything between the brackets below is Optional Selling Copy, and according to container size and type may or may not be placed on the front panel, back panel, card or peel back label}

[

- {1.} Aerosol-like Spray
- {2.} Continuous Spray
- {3.} No Rubbing required
- {4.} One Touch Pump
- {5.} Easy Application
- {6.} No Mess
- {7.} Convenient, no mess, no rub protection
- {8.} Spray Upside Down
- {9.} Level {for packages with clear indicator of amount remaining}
- {10.} Running Low {for packages with clear indicator of amount remaining}
- {11.} Twist Close Cap
- {12.} Airplane carry-on size
- {13.} TSA {approved} travel size
- {14.} TSA [approved] carry-on size
- {15.} Convenient Travel Size
- {16.} Convenient Airplane Travel Size
- {17.} Airplane carry-on
- {18.} Carry on size
- {19.} Protects against ticks and mosquitoes for up to 12 hours, and biting flies, stable flies, black flies, gnats, chiggers, and sand flies for up to 8 hours
- {20.} For up to 12 hours of protection against mosquitoes and ticks, and up to 8 hours of protection against biting flies, stable flies, black flies, gnats, chiggers, sand flies and Scottish biting midges.
- {21.} Use with confidence on the whole family
- {22.} And your family will want to use it, too
- {23.} Not oily, greasy or sticky
- {24.} Cool Spray

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Rev. 10/9/18

- {25.} Spray (and) ('n) go
- {26.} Non-oily
- {27.} Does not damage plastic
- {28.} Won't Damage Fishing Lines, Plastics or other Synthetic Materials [Fisherman's Formula]
- {29.} [Won't Damage Fishing Lines, Plastics or other Synthetic Materials [Gear Safe]]
- {30.} Unscented [Repels bug(s), not people]
- {31.} Pocket Size
- {32.} Repels [mosquitoes] [ticks] [mosquitoes and ticks] for up to 12 hours, and biting flies, stable flies, black flies, gnats, chiggers, sand flies, and Scottish biting midges for up to 8 hours.
- {33.} Non-Staining
- {34.} Quick Drying
- {35.} Dye-Free
- {36.} [Not your standard aerosol:]
 - a. Apply upside down without worry
 - b. Product delivery is the same regardless of the position the can is held during spraying
 - c. May be sprayed upright, inverted, or at any angle
 - d. Constant pressure of application – won't lose pressure as can empties
 - e. Same product delivery from the initial spray to the last spray
 - f. Continuous Spray [Insect Repellent] [Mosquito Repellent]
 - g. Quick and Even Coverage
 - h. No Rub, No Hassle
 - i. No chilling effect compared to a standard aerosol
 - j. No pumping motion needed
- {37.} Pleasant [Fragrance] [Scent]
- {38.} Unscented
- {39.} Feels light and clean
- {40.} No one will know you're wearing it
- {41.} You won't smell it
- {42.} You'll forget you're wearing it
- {43.} Won't damage [fishing line, gun barrel, plastic lenses] [sporting equipment] [camping equipment]
- {44.} Clean, dry feel
- {45.} Light, Clean
- {46.} Passes ASTM F2621-12 Standard Practice Method (Electric Arc Test)
- {47.} Passes IEC 61482-1-1: 2009 Live Working Method (Electric Arc Test)
- {48.} Insect repellent to be used on general clothing, [FR] [Flame Resistant] [FRC] clothing.
- {49.} Will not affect the protection properties of FR (Flame Resistant) clothing (After 30 minute drying time).
- {50.} For Clothing & Gear
- {51.} For use on general clothing, [FR] [Flame Resistant] [FRC] clothing, and skin

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Rev. 10/9/18

- {52.} For use by any worker exposed to insects around electric and power utilities.
- {53.} Spray on: shirts, pants, socks, hats, boots and shoes.
- {54.} Will not damage fabrics and plastics.
- {55.} Patent Pending Formulation Application {Patent # _____ for use on FR clothing}
- {56.} Will not adversely affect [Rubber Lineman's gloves] [Rubber Goods]
- {57.} Passes ASTM D120 AC Electrical Proof Test
- {58.} [Outdoor] [Worker] [Workman's] [Utility Worker] [Utility Worker's] formula.
- {59.} [Sportman] [Sportman's] [Outdoor] formula.
- {60.} [Outdoor] [12 Hour] protection.
- {61.} 12 Hour protection for Mosquitoes and Ticks.
- {62.} Performed ASTM D6413 (Vertical Flame Test) with 0 [Zero] Afterflame

]
{OPTIONAL GRAPHICS}

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