

APR 1 2003

Jean Killoren
WPC Brands, Inc.
1 Repel Road
Jackson, WI 53037

Subject: Repel Insect Repellent Towelette
EPA Registration No. 305-29
Submission dated January 12, 2000
Application dated June 26, 2002
Application dated October 30, 2002

Dear Ms. Killoren:

The proposed amendment to the registration for the product cited above under The Federal Insecticide, Fungicide And Rodenticide Act, as amended revising the label in response to the DEET RED, PR Notices 2001-1 and 2001-6 and the Agency's letter of September 27, 2002 is acceptable subject to the comments listed below:

1) Change the third section of the First Aid block to read:

If you suspect a reaction to this product:

- * Discontinue use;
- * Take off contaminated clothing;
- * Rinse skin immediately with plenty of water for 15-20 minutes;
- * Call a poison control center or doctor for treatment advice.

2) Add the statement, "For additional information in case of emergency call toll free (insert Telephone Number), to the First Aid block.

3) In the Hazard To Humans And Domestic Animals section, revise the statement, "Wash hands xxx tobacco.", to read, "Wash hands xxxxx using tobacco or using the toilet."

4) Move the statements, "Do not apply over cuts, wounds or irritated skin. Do not allow children to handle this product.", from the Precautionary Labeling section to the Directions For Use section.

5) Add the statement, "Apply sparingly around ears.", to the Directions For Use.

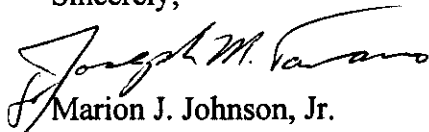
6) Place the storage and disposal statements in a box and add the statement, "PESTICIDE STORAGE; store in a cool, dry place inaccessible to children."

This product is not being re-registered at this time. Product specific efficacy data will be required. Once the efficacy guidelines are in place, you will be notified of the efficacy requirements.

A stamped copy of the amended label is enclosed for your records. Submit two copies of the final label before the product is released for shipment under this revised label.

If you have any questions or comments please contact Joseph Tavano at (703) 305-6411.

Sincerely,



Marion J. Johnson, Jr.
Product Manager 10
Insecticide Branch
Registration Division(7505C)



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Master Label

ACCOUNT # 100
with COMMENTS
In EPA Letter Dated:

Base Name:

Repel Insect Repellent Towelette

APR 1 2003
Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
305-29

INSECT REPELLENT (either in name or stated separately)

Keep Out of Reach of Children

CAUTION: See back panel for precautions

ACTIVE INGREDIENTS:

DEET	55.0%
OTHER INGREDIENTS:	45.0%
TOTAL	100.0%

Net Weight oz (gm)

Manufactured for:	WPC Brands, Inc.
Jackson, WI 53037	Made in the U.S.A.
Questions or Comments?	Call 800/558-6614
EPA Reg. No. 305-29	EPA Est. No. XXX-XX-X
www.wpcbrands.com	

Back labeling

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.**

Individual packages: Tear open envelope and unfold towelette.

Multiple packages: Open package and remove single towelette, Seal tightly after removal.

Unfold towelette. Wipe on a thin uniform film over all exposed skin except eye and mouth. Use just enough repellent to cover exposed skin and/or clothing. Do not use under clothing. Avoid over-application. When using on children, apply to your own hands and then put it on the child. Do not apply to children's hands.

Works on clothing too: wipe shirts, pants, and hats. For ticks, chiggers and fleas apply to tops of socks and around opening in outer clothing.

After returning indoors, wash treated skin with soap and water. Wash treated clothing before wearing it again.

STORAGE AND DISPOSAL: Do not contaminate water, food, or feed by storage and disposal. If empty: Do not reuse this container. Place in trash or offer for recycling if available. 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.

PRECAUTIONARY STATEMENTS:

HAZARD TO HUMANS AND DOMESTIC ANIMALS - CAUTION: Causes moderate eye irritation. Avoid contact with eyes. Harmful if swallowed. Do not apply over cuts, wounds or irritated skin. Use of this product may cause skin reactions in rare cases. Do not allow children to handle this product. Wash hands before eating, drinking, chewing gum, or using tobacco.

FIRST AID
If in eyes:
• Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.
If swallowed:
• Call a poison control center or doctor immediately for treatment advice.
• Have a 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 doctor.
• Do not give anything by mouth to an unconscious person.
If you suspect a reaction to this product, discontinue use and wash treated skin.
Call a poison control center or doctor for further treatment advice. Have the product label with you when calling a poison control center or doctor, or going for treatment.

PHYSICAL AND CHEMICAL HAZARDS: FLAMMABLE -

Keep away from heat, sparks and open flame.

❖ Do not apply to synthetic fabrics such as acetate, rayon or spandex. Will not damage cotton, wool and nylon. May damage furniture finishes, leather, plastics, painted and varnished surfaces including watch crystals, guns, bows and automobiles. Allow repellent to dry before handling bow or gun stock.

Optional marketing claims:

- ❖ Provides effective long lasting protection from mosquitoes, ticks, chiggers, black flies, sand flies, deerflies, fleas and other biting insects.
- ❖ Repels mosquitoes, ticks, biting flies, gnats, chiggers and fleas.
- ❖ 55% DEET
- ❖ It works
- ❖ Sports-Active Formula
- ❖ Hunting, Camping, Fishing, all outdoor activities
- ❖ Ready-to-use, unscented insect repellent towelette
- ❖ Zip-Pak® Re-sealable Packaging. To open, tear across at notch, remove towel and use immediately - tightly RESEAL. Zip-Pak® is a trademark of Illinois Tool Works, Inc.
- ❖ Repels:

Insect	Hours of Protection
Mosquitoes	8 hours
Black flies, gnats, ceratopogonids, no-see-ums, punkies & biting midges	5 hours
Tick & Chiggers	5 hours
Stable flies, horse flies, deer flies and greenheads	3 hours

Key

- ❖ Optional text/information may or may not be on label. (Optional text) - May be left out of text, used in place of preceding text or in conjunction with preceding text. (Italicized - for informational purposes only.)