

305-29

11/12/2008

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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

November 12, 2008

Mr. William H. Metzger,
Division Vice-President - Regulatory Affairs
WPC Brands, Inc.
P.O. Box 4406
Bridgeton, MO 63044-0406

**Subject: Amended Reregistration Label
Repel Insect Repellent Towelette, EPA Reg. No. 305-29
Your Submission Dated August 20, 2008**

Dear Mr. Metzger:

The Agency, in accordance with the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, has completed reviewing all of the information submitted with your application to support the reregistration of Repel Insect Repellent Towelette (EPA Reg. No. 305-29), in connection the DEET Reregistration Eligibility Decision (RED), and have concluded that your submission is acceptable with the following label revision provision(s):

General Statement:

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

Directions for Use section comment(s):

2. In the 1st bulleted paragraph, replace the words "Works on clothing too:" with "For use on outer surfaces of clothing:"

Storage and Disposal Statement section comment(s):

3. To facilitate inclusion of language from PR Notice 2007-4, replace this section with:

STORAGE AND DISPOSAL

Pesticide Storage: Store this product in a cool, dry place that is inaccessible to children.
Container Disposal: If empty: Nonrefillable container. Do not reuse or refill this container. 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.

General Comment(s):

4. Current labels on DEET repellent products tend to dissolve from contact with the repellent (usually liquids). All reregistered DEET product labels must use materials that remain permanent and readable for the reasonable life of the product.

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.

Should you wish to add/retain a reference to the company's website on your label, please be aware that the website becomes labeling under FIFRA 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) lists 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 be 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 EPA's Office of Enforcement and Compliance Assurance (OECA). As an alternative, you may refer consumers to the company's phone number or e-mail address.

A copy of your label stamped "Accepted with Comments" is enclosed for your records. 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.

If you have any questions about this label review, please contact Mr. Carmen J. Rodia, Jr. at (703) 306-0327 or via e-mail at Rodia.Carmen@epa.gov.

Sincerely Yours,



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

Enclosure: Label stamped "Accepted with Comments"
000305-00029 D400837

Master Label

Base Name:

Repel Insect Repellent Towelette

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 %

Contains 18 Towelettes, Total Net Weight 3 oz (85 g)

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. Apply sparingly around ears. Use just enough repellent to cover exposed skin and/or clothing. Do not use under clothing. Avoid over-application. Do not apply over cuts, wounds or irritated skin. Do not allow children to handle this product. 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: PESTICIDE STORAGE: Store in a cool, dry place, out of reach of children. CONTAINER 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 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. Use of this product may cause skin reactions in rare cases. Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.

FIRST AID
If in eyes: <ul style="list-style-type: none">• 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: <ul style="list-style-type: none">• 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: <ul style="list-style-type: none">• 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.
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. For additional information in case of emergency call toll free 1-800-255-3924.

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.

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

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ACCEPTED
With COMMENTS
In EPA Letter Dated:
November 12, 2008
Under the Federal Insecticide, Fungicide
and Rodenticide Act, As amended, for the
pesticide Registered under EPA Reg. No:
305-29

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Master Label

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	6 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.