

18 JUL 1994

Ms. Jean Killoren
Wisconsin Pharmacal Company
Division of Badger Pharmacal, Inc.
2977 Highway 60
P.O. Box 198
Jackson, WI 53037

Dear Ms. Killoren:

Subject: Label Revisions
EPA Reg. No. 305-28
EPA Reg. No. 305-30
EPA Reg. No. 305-31
EPA Reg. No. 305-32
EPA Reg. No. 305-39
EPA Reg. No. 305-40
Submission: June 30, 1994

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

The Insect Protection Factor is not acceptable. Please remove all IPF (Insect Protection Factor) labeling from each of these products. It is not clear to us that higher concentrations of DEET are necessarily more efficacious. Also, if we were to approve such a factor, "IPF" marketing claims could proliferate and we would be unable to determine what may be an appropriate factor for multiple active ingredients or other active ingredients. We consider these claims to be misbranding as described in 40 CFR 156.10(a)5.

Sincerely,



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

- 100% DEET Formula
- Protects for up to 10 hours
- For severe conditions
- Withstands water, perspiration and wear
- The most concentrated insect repellent you can buy

REPEL[®] 100

BUG BLOCK

100 IPF

(Insect Protection Factor)

Effective, Long Lasting Insect Protection

The IPF (Insect Protection Factor) was developed to remove the mystery in choosing the appropriate level of insect protection. The IPF number corresponds to the amount of insect protection that each Repel product provides. A lower IPF is appropriate for times when bugs are few, a higher IPF is for use when bugs are really biting.

DIRECTIONS FOR USE: It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Read all directions before using this product.

Apply over all exposed skin to repel mosquitoes, ticks, and biting flies. To apply to face and neck, dispense on palm and rub on. Do not spray in enclosed areas. For chiggers, ticks and fleas, apply to socks, tops of shoes and around other openings in outer clothing. Use just enough repellent to cover exposed skin and clothing. Do not use under clothing. Avoid overexposure. Frequent reapplication and saturation is unnecessary for effectiveness. After returning indoors, wash treated skin and clothing with soap and water. Do not apply to synthetic fabrics. May be used on cotton and wool. **MAY DAMAGE FURNITURE FINISHES, LEATHERS, PLASTICS, PAINTED SURFACES AND WATCH CRYSTALS.**

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS — CAUTION — HARMFUL IF SWALLOWED

Do not apply to eyes and mouth. May cause eye injury. Do not spray directly on face. Do not apply to hands of young children. Do not apply to severely sunburned or otherwise damaged skin.

PRACTICAL TREATMENT: Use of this product may cause skin reactions in rare cases. If so, wash treated skin, call your local Poison Control Center. If in eyes, flush with plenty of water. If irritation persists, get medical attention. If swallowed, contact a Poison Control Center.

DISPOSAL: Do not reuse container.
Wrap container and put in trash collection.

Manufactured by
Wisconsin Pharmaceutical Company, Inc.
Jackson, WI 53037
MADE IN THE U.S.A.

EPA REG. NO. 305-30 EPA EST. NO. 305-WI-1



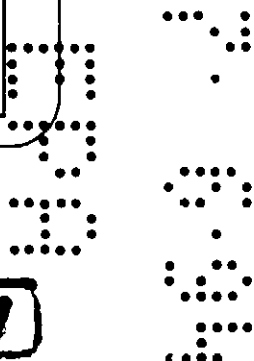
ACCEPTED
with COMMENTS
In EPA Letter Dated

18 JUL 1994

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.

305-30

BEST AVAILABLE COPY



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REPEL[®]
100 **BUG BLOCK**
100
IPF

(Insect Protection Factor)

Effective, Long Lasting Insect Protection

ACTIVE INGREDIENTS:

N, N-diethyl-m-toluamide 95%
Other Insecticides 5%

CAUTION

KEEP OUT OF REACH OF CHILDREN
See Precautions on Back Panel

EPA REG. NO. 305-30
EPA EST. NO. 305-WI-1

Manufactured by
Wisconsin Pharmaceutical Company, Inc.
Jackson, WI 53037

NET CONTENTS 1 FL. OZ. (30ml)

BEST AVAILABLE COPY