

305-30

10/29/2008

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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

October 29, 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 100 INSECT REPELLENT, EPA Reg. No. 305-30
Your Submission Dated August 7, 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 100 INSECT REPELLENT (EPA Reg. No. 305-30), 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."

Optional Marketing Claims section comment(s):

- 2. Delete the 3rd optional marketing claim. This is not a 100% DEET product.
- 3. In the 9th optional marketing claim, delete the term "greenheads" since it is the same as the term "horse flies."

Directions for Use section comment(s):

- 4. On the 1st bulleted statement following the 1st paragraph, replace the words "Works on clothing too:" with "For use on outer surfaces of clothing:"

Storage and Disposal Statement section comment(s):

- 5. To facilitate inclusion of language from PR Notice 2007-1, replace this section with:

STORAGE AND DISPOSAL

Pesticide Storage: Store this product in a cool, dry place that is inaccessible to children.
Container Disposal: Do not puncture or incinerate! **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.

Warranty & Disclaimer section comment(s):

- 6. Within forty-five (45) days from the date of this letter, WPC Brands, Inc. should submit a label amendment revising the "**WARRANTY & DISCLAIMER**" section (label statement at bottom left-hand side of page 2 of 2, starting with "NOTICE: Buyer assumes ...") in accordance with the guidance document entitled, "Guidance on Warranty Statements," dated October 17, 2006. This update can be found at the following hyperlink:
<http://www.epa.gov/pesticides/regulating/labels/warranty.pdf>
- 7. The "**WARRANTY & DISCLAIMER**" section heading must be placed on the top and in a central position above the **WARRANTY & DISCLAIMER** section.

General Comment(s):

- 8. 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.
- 9. The Agency determined in the DEET RED document that all aerosol and pump spray formulations must be packaged in containers utilizing a concave trigger to help aim product or other comparable mechanism that will ensure that the product will not be inadvertently sprayed in the eyes.

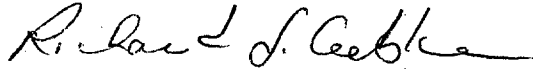
The Agency is in the process of developing and improving the current Efficacy Assessment Guidelines for repellent products. The Agency intends to defer the determination of any related efficacy data requirements supporting the claims that may appear on this label until these Efficacy Assessment Guidelines 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"
000305-00030 D400836

Repel 100

INSECT REPELLENT *(either in name or stated separately)*

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 & fleas.
- ~~❖ 100% DEET* (Formula) *Relative % DEET~~
- ❖ Protects [for] up to 10 hours
- ❖ For severe conditions
- ❖ Withstands water, perspiration and wear
- ❖ The most concentrated insect repellent you can buy
- ❖ Effective, Long Lasting Insect Protection
- ❖ Repels:

Insect	Hours of Protection
Mosquitoes	10 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

- Repels mosquitoes that may carry West Nile virus.
- Also repels Ticks, Biting Flies, Gnats, No-See-Ums, Chiggers & Fleas

Active Ingredients:

DEET.....	98.11%
Other Ingredients.....	1.89%
Total	100.00%

KEEP OUT OF REACH OF CHILDREN
WARNING. See back panel for precautions.

Note: Source of AI is from Morflex or MGK: (not part of label only)

Net Contents 1 oz (29 mL)

ACCEPTED
With COMMENTS
in EPA Letter Dated:
October 29, 2008
Under the Federal Insecticide, Fungicide
and Rodenticide Act, As amended, for the
pesticide Registered under EPA Reg. No:

Back label

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.

Apply over all exposed skin to repel mosquitoes, ticks and biting flies. Use just enough repellent to cover exposed skin and/or clothing. Do not use under clothing. Do not spray in enclosed areas. Do not spray directly on face. If used on the face, spray on hands first then apply sparingly to face and ears. Do not apply near eyes and mouth. 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~~ Spray shirts, pants and hats. For ticks, chiggers and fleas apply to tops of socks and around openings of outer clothing.

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

STORAGE AND DISPOSAL

PESTICIDE STORAGE: Store the product in a cool, dry place, out of reach of children.

CONTAINER DISPOSAL: Do not Puncture or Incinerate. **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

WARNING. Causes substantial but temporary eye injury. Do not get in 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 toilet.

Paragraph format may be used if label is small.

FIRST AID
If swallowed: <ul style="list-style-type: none">• Call a Poison Control Center or doctor 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 doctor.• Do not give anything by mouth to an unconscious person.
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 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.
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 1-888-880-1181.
Note to Physician: Probable mucosal damage may contraindicate the use of gastric lavage.

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

Made in the USA
WPC Brands, Inc.
PO Box 4406
Bridgeton, Missouri 63044

www.wpcbrands.com

Questions or Comments? Call 1-888-880-1181

EPA Reg. No. 305-30

EPA Est. No. 305-WI-1

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[Bracketed text] = Optional Language