

DEC 03 1991

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


Dear Ms. Thome:

Subject: New Label Submission for Transferred Product  
Repel Family Formula 27 Insect Repellent  
EPA Reg. No. 305-39  
Submission: November 26, 1991

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. Five copies of the finished labeling must be submitted prior to releasing the product for shipment.

- 1) Remove the word "liberal" from the phrase "Make liberal application along all openings of the clothing...". This word is not in keeping with the DEET Label Improvement Program intent of limiting exposure.
- 2) Remove the total percentage (38.36%) for active ingredients from the ingredient statement.
- 3) You have removed from the statement of practical treatment, language instructing the user to induce vomiting if swallowed (with no explanation). Please indicate why you have done this and consider whether you should include some sort of instruction for those users who do not have ready access to a physician. We are interested in your response.

Sincerely,

  
Richard F. Mountfort  
Product Manager 10  
Insecticide & Rodenticide Branch  
Registration Division (H7505C)

RSB

# REPEL<sup>®</sup>

## REPEL<sup>®</sup> FAMILY FORMULA<sup>™</sup> 27 INSECT REPELLENT

Repels Mosquitoes, Biting Flies, Chiggers,  
Ticks and Other Flying Insects,  
Including Fleas on Exposed Skin Surfaces.

REPEL<sup>®</sup> Family Formula<sup>™</sup> with a soft scent, provides long lasting, non-greasy, effective protection.

**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.

Hold container 6 to 8 inches from skin or clothing and spray with a slow sweeping motion. Do not spray in enclosed areas. 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.

### INSECT REPELLENT SCENTED

### FAMILY FORMULA<sup>™</sup> 27

### FAMILY FORMULA<sup>™</sup> 27

EFFECTIVE, SCENTED PROTECTION

**FOR EXPOSED SKIN AREAS, TO REPEL FLIES, GNATS AND MOSQUITOES:** Use as directed above. Do not apply to eyes and mouth. Do not apply to hands of young children. Do not spray directly on face. For treating face, spray in palm of hand, rub palms together and rub on face. Do not apply over cuts, wounds, or irritated skin.

**FOR CLOTHING, TO REPEL TICKS, FLEAS AND CHIGGERS:** Make liberal application along all openings of the clothing, cuffs of trousers, tops of socks, shoes, hats and areas of clothing which may contact the ground, weeds or other growth.

After returning indoors, wash treated skin with soap and water. Wash treated clothing.

#### PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS

**CAUTION:** Causes eye irritation. Harmful if swallowed. Do not let children rub their eyes if hands have been treated. Use of this product may cause skin reactions in rare cases. If you suspect that you or your child is reacting to this product, wash treated skin and call your local Poison Control Center.

#### STATEMENT OF PRACTICAL TREATMENT

**IF IN EYES:** Flush eyes with plenty of water. Get medical attention if irritation persists.  
**IF SWALLOWED:** Call a physician or Poison Control Center.

#### PHYSICAL HAZARDS

**EXTREMELY FLAMMABLE:** Contains under pressure. Do not use near fire, heated surfaces, sparks or flames. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting. May damage plastics, varnished or painted surfaces. May be used on Nylon, Orlon, wool or cotton. DO NOT apply to synthetic fabrics.

#### STORAGE AND DISPOSAL

**STORAGE:** Store in original container in cool, locked storage area away from heat and open flame.

**DISPOSAL:** Replace cap and discard containers in trash. Do not incinerate or puncture. Securely wrap original container in several layers of newspaper and discard in trash.

U.P.C.

Manufactured for  
Waters Pharmaceutical Company, Inc.  
Jackson, MI 48303  
MADE IN THE U.S.A.

EPA REG. NO. 305-39  
EPA EST. NO. 3857-WI-2

**CAUTION**  
KEEP OUT OF REACH OF CHILDREN  
See Precautions on Back Panel

<b>ACTIVE INGREDIENTS:</b>	38.36%
N, N-diethyl-male toluamide	25.50%
Other Inert	1.35%
N-octyl bicycloheptene dicarboximide	7.87%
Dl-n-propyl pectinetherosulfate	3.84%
<b>INERT INGREDIENTS:</b>	61.64%

NET WT. 6.5 OZ.

Ticket  
28293-98  
Transfer

**REPEL® FAMILY FORMULA™ INSECT REPELLENT**  
 See directions on packaging materials.  
**PRECAUTIONARY STATEMENTS**  
**HAZARDS TO HUMANS**

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**STATEMENT OF PRACTICAL TREATMENT**  
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**PHYSICAL HAZARDS**  
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Mfd. for Wisconsin Pharmaceutical Company, Inc. • Jackson WI, 53037  
 MADE IN THE U.S.A.  
 EPA REG. NO. 305-37 EPA EST. NO. 3057-WI-2

**REPEL®**  
**INSECT REPELLENT**  
**SCENTED**

**FAMILY FORMULA™ 27**  
**EFFECTIVE, SCENTED PROTECTION**

<b>ACTIVE INGREDIENTS</b>	<b>33.83%</b>
N,N-diethylmetolothionide	23.50%
Cyfluthrin	1.33%
N-ethylhexachlorohydrate	7.67%
Chlorpyrifos ethiononate	3.84%
<b>INERT INGREDIENTS</b>	<b>61.64%</b>

**CAUTION**  
 KEEP OUT OF REACH OF CHILDREN  
 See Precautions or Back Panel  
 NET WEIGHT 1.1 OZ.

**ACCEPTED**  
 With COMMENTS  
 In EPA Letter Dated  
**DEC 03 1991**  
 Under the Federal Insecticide,  
 Fungicide, and Rodenticide Act  
 as amended, for the pesticide  
 registered under EPA Reg. No.  
305-39

**REPEL<sup>6</sup> FAMILY FORMULA<sup>777</sup> INSECT REPELLENT**  
Repels Mosquitoes, Biting Flies, Chiggers, Ticks and Other Flying Insects,  
Including Fleas on Exposed Skin Surfaces.

REPEL<sup>6</sup> Family Formula<sup>777</sup>, with a soft scent, provides long lasting, non-greasy, effective protection.

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HAZARDS TO HUMANS**

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

EPA REG. NO. 305-3/EPA EST. NO. 3657-WI-2