

APR 1 2003

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

Subject: Repel 18 Insect Repellent  
EPA Registration No. 305-40  
Submission dated October 31, 2002  
Application dated May 22, 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 Add the following Note To Physician: "Probable mucosal damage may contraindicate the use of gastric lavage."

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

5) 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 since REDs have not been issued for all the active ingredients.

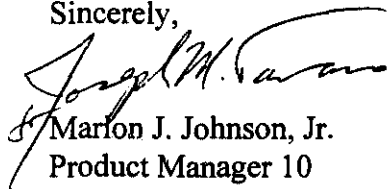
Efficacy data will be required for this product. Once the new Efficacy Guidelines have been published and are in place, you will be notified of the efficacy requirements.

Also, to meet the requirement of the DEET RED, the product must be packaged in containers utilizing a concave trigger to help aim the product or other comparable mechanism that will ensure that the product will not be inadvertently sprayed in the eyes.

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,



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



### Master Label

Base Name:

**Repel 18**  
**Repel Insect Repellent Unscented Sportsmen Formula 18**

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

**ACTIVE INGREDIENTS:**

DEET	17.5 %
N-octyl bicycloheptene dicarboximide (MGK-264)	5.0 %
Di-n-propyl isocinchomeronate (MGK-R326)	2.5 %
<b>OTHER INGREDIENTS:</b>	<u>75.0 %</u>
<b>TOTAL</b>	<b>100.0 %</b>

Keep Out of Reach of Children

WARNING: See back panel for precautions.

Net Weight oz ( gm)

WPC Brands, Inc.	Jackson, WI 53037
Made in the U.S.A.	www.wpcbrands.com
Questions or Comments?	Call 1-800-558-6614
EPA Reg. No. 305-40	EPA Est. No. 305-WI-1

*Optional marketing claims:*

- ❖ 18% DEET\*      \*Relative% DEET
- ❖ Repels: Mosquitoes, Ticks, Chiggers, Deer Flies, Stable Flies, Black Flies, Gnats, Fleas (on exposed skin surfaces).
- ❖ Effective, long lasting ((un)scented) protection
- ❖ Hours of effective ((un)scented) protection from mosquitoes, ticks, black flies, gnats, chiggers, no-see-ums, sand flies, deer flies, fleas, biting flies and other biting insects.
- ❖ The long-lasting, non-greasy formula provides exceptional effective protection.
- ❖ Non greasy and resists perspiration
- ❖ Developed especially for campers, backpackers, fisherman, hunters, golfers, bikers, hikers, joggers, ball players and active outdoor enthusiasts
- ❖ Non-Aerosol Pump
- ❖ Spray Pump

**ACCEPTED**  
**with COMMENTS**  
**In EPA Letter Dated:**  
**APR 1 2003**  
**Under the Federal Insecticide,**  
**Fungicide, and Rodenticide Act,**  
**as amended, for the pesticide**  
**registered under EPA Reg. No.**  
**305-40**

**Key**

- ❖ Optional phrases (Optional language (text)) – May be left out of text, used in place of preceding text or in conjunction with preceding text
- First Aid statements should be in a solid box or presented in an easy to use fashion.

**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 areas to repel biting insects. 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 of 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.

**STORAGE & 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 - WARNING:** Causes substantial but temporary eye injury. 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, using tobacco or using toilet.

<b>FIRST AID</b>
<b>If in eyes:</b>
<ul style="list-style-type: none"> <li>• 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.</li> </ul>
<b>If swallowed:</b>
<ul style="list-style-type: none"> <li>• Call a poison control center or doctor immediately for treatment advice.</li> <li>• Have a person sip a glass of water if able to swallow.</li> <li>• Do not induce vomiting unless told to do so by a poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
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.