

305-43

02-21-2009

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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Mr. Eric D. Smith
Regulatory Affairs Manager
WPC Brands, Inc.
P.O. Box 4406
Bridgeton, MO 63044

FEB 21 2009

RE: Notification per PR Notice 98-10 to add an optional Marketing Claim to the
label: "Pocket Size"
EPA Registration No.: 305-43
Date of Submission: January 23, 2009

Dear Mr. Smith:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated January 23, 2009, for the product Sun & Bug Stuff. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested fall within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions, please call me directly at 703-305-6249 or Joyce Edwards of my staff at 703-308-5479.

Sincerely,

A handwritten signature in black ink, appearing to read "Linda Arrington".

Linda Arrington
Notifications & Minor Formulations Team Leader
Registration Division (7505P)
Office of Pesticide Programs



United States Environmental Protection Agency
Office of Pesticide Programs (H7505C)
Washington, DC 20460

Application for Pesticide:

<input type="checkbox"/>	Registration
<input type="checkbox"/>	Amendment
<input checked="" type="checkbox"/>	Other

OPP Identifier Number

Section I

1. Company/Product Number 305-43	2. Product Manager R. Gebkin	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Sun & Bug Stuff	PM# 10	
5. Name and Address of Applicant (include ZIP Code) WPC Brands, Inc. P.O. Box 4406 Bridgeton, MO 63044 <input type="checkbox"/> Check if this is a new address	6 Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labelling to: NOTIFICATION EPA Reg. No. FEB 21 2009 Product Name _____	

Section II

<input type="checkbox"/> Amendment - Explain below	<input type="checkbox"/> Final printed label in response to Agency letter date
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "ME TOO" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - explain below

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Notification per PR Notice 98-10 to add an optional marketing claim to the label.

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section III

1. Material in Which This Product Will Be Packaged:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes * <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water-Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____		
* Certification must be submitted	If "YES," Unit package wgt	No. per container			
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) of Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label Is Affixed To Product <input type="checkbox"/> Lithographed <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

Section IV

1. Contact Point (Complete items directly below for identification of the individual to be contacted, if necessary, to process this application)			
Name Eric D. Smith	Title Regulatory Affairs Manager	Telephone No. (include Area Code) 314-683-2455	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6 Date Application Received (Stamped)	
2. Signature 			3. Title Regulatory Affairs Manager
4. Typed Name Eric D. Smith			5. Date January 23, 2009

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WPC Brands, Inc.

P.O. Box 4406
Bridgeton, MO 63044

January 23, 2009

U.S. Environmental Protection Agency
Office of Pesticide Programs (7504P)
Document Processing Desk (NOTIF)
Room S4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202-4501

Attention: Mr. Richard Gebken
Product Manager 10

**Subject: Notification per PR Notice 98-10
Sun & Bug Stuff
EPA Reg. No. 305-43**

Dear Mr. Gebken:

Please find the enclosed notification per PR Notice 98-10 to add the following optional marketing claim: "Pocket Size." The claim refers to the reduction in size of the product which is now small enough to literally fit into one's shirt, jacket, or pants pocket.

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

The following documents are enclosed in support of this submission:

1. Application for Pesticide (EPA Form 8570-1)
2. One copy of the proposed label *with changes highlighted*
3. One clean copy of the proposed label

Please feel free to call me at 1-800-242-1166 Ext. 2455, should you have any questions or require additional information.

Sincerely,



Eric D. Smith
Regulatory Affairs Manager

Sun & Bug Stuff

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

Optional Marketing Claims

- ❖ Combination Insect Repellent and Sunscreen
- ❖ Unscented Protection From Sun and Mosquitoes.
- ❖ Blocks bites and burns at the same time!
- ❖ Repels Mosquitoes, Ticks, Chiggers, Fleas, no-see ums, Biting Flies, Sand Flies and Gnats.
- ❖ 20% DEET
- ❖ Outdoor protection (for the entire family) in a (smooth) lotion that is not sticky or greasy.
- ❖ Family Protection
- ❖ Bug bite and Sunburn protection all in one!
- ❖ Insect Repellent protects against Mosquitoes, Ticks, Chiggers, Fleas, no-see ums, Sand Flies and Gnats!
- ❖ Smooth, pleasant scent
- ❖ Aminobenzoic acid (PABA)-free formula.
- ❖ Insect Repellent with (15 SPF) Sunscreen that actually repels mosquitoes, chiggers, gnats!
- ❖ Provides UVA/UVB protection
- ❖ Provides moderate protection against sunburn
- ❖ For skin that sunburns easily
- ❖ Moderate sun protection product
- ❖ Sun Alert: Limiting sun exposure, wearing protective clothing, and using sunscreens may reduce the risks of skin aging, skin cancer, and other harmful effects of the sun.
- ❖ SPF 15
- ❖ Helps prevent sunburn
- ❖ Higher SPF gives more sunburn protection.
- ❖ Provides sun protection and repels mosquitoes, ticks, gnats, chiggers and biting flies.
- ❖ Pocket Size

Active Ingredients:

DEET	20.0 %
Other Ingredients	80.0 %
TOTAL	100.0 %

Active Sunscreen Ingredients: Octylmethoxycinnamate; Oxybenzone

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

NET WT __ OZ (__ g)

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.**

To repel insects and protect against sunburn, apply evenly on exposed skin areas 15 minutes before exposure. Reapply as needed or after towel drying, swimming or perspiring. Use just enough product to cover exposed skin. Do not use under clothing. If used on face, spread 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, sunburned, 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. As with all sunscreens, for children under 6 months of age: ask a doctor.

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 inaccessible to children. Do not contaminate water, food, or feed by storage and disposal. **CONTAINER DISPOSAL:** If empty: Do not reuse this container. Place in trash or offer for recycling if available. If partly filled: Call your local waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

PRECAUTIONARY STATEMENTS

Hazards to Humans

CAUTION. Use of this product may cause skin reactions in rare cases. Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.

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.

NOTIFICATION Have the product container 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.

[Physical Hazards] 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, beach equipment, guns, bows and automobiles.

FEB 21 2009

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

[Questions or comments?] Call 1-888-880-1181

Made in the U.S.A. by WPC Brands, Inc.
P. O. Box 4406
Bridgeton, MO 63044-0406

EPA Reg. No. 305-43

EPA Est. No. 305-WI-1

Key

- Highlighted items have been added/corrected
 - ❖ 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.

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NOTIFICATION
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