

305-43

5/6/2010

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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

May 6, 2010

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

Subject: Label Notification(s) for Pesticide Registration Notice 2007-4

Dear Mr. Smith:

The Agency is in receipt of your Application(s) for Pesticide Notification under Pesticide Registration Notice PRN 2007-4 dated April 6, 2010 for the following product(s):

Sun & Bug Stuff; EPA Reg. No. 305-43

The Registration Division (RD) has conducted a review of this request for applicability under PRN 2007-4 and finds that the label change(s) requested falls within the scope of PRN 2007-4. The label has been date-stamped "Notification" and will be placed in our records.

Please be reminded that 40 CFR Part 156.140(a)(4) requires that a batch code, lot number, or other code identifying the batch of the pesticide distributed and sold be placed on nonrefillable containers. The code may appear either on the label (and can be added by non-notification/PR Notice 98-10) or durably marked on the container itself.

If you have any questions, please contact Regina Foushee'-Smith at 703-605-0780.

Sincerely,

Richard J. Gebken
Product Manager
Insecticide Branch
Registration Division (7505P)

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Please read instructions on reverse before completing form.

Form Approved: EPA No. 2070-0060. Approval expires 11-30-93



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

Application for Pesticide:

Registration
Amendment
Other

OPP Identifier Number

Section I

1. Company/Product Number 305-43	2. Product Manager R. Gebken	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. NOTIFICATION Section 3(c)(3) (b)(i), my product is similar or identical in composition and labelling to: MAY - 6 2010 EPA Reg. No. _____ 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.)
Label Notification per PR Notice 2007-4 & 98-10 (Please see cover letter for details.)

Section III

1. Material in Which This Product Will Be Packaged:			
Child-Resistant Packaging <input type="checkbox"/> Yes * <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water-Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input checked="" 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 checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) of Retail Container 0.5, 4 oz	5. Location of Label Directions <input checked="" 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 checked="" 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) 314-688-2455
2. Signature 		6 Data Application Received (Stamped)
3. Title Regulatory Affairs Manager		
4. Typed Name Eric D. Smith		5. Date April 6, 2010

WPC Brands, Inc.

P.O. Box 4406
Bridgeton, MO 63044-3720

April 6, 2010

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

Attention: Mr. Richard Gebken
Product Manager 10

Subject: **NOTIFICATION: Label Notification per PRN 2007-4 & PRN 98-10
Sun & Bug Stuff
EPA Reg. No. 305-43**

Please find the enclosed application for notification of the following registration amendments:

A. Pesticide Registration Notice (PR) 2007-4, Final Rule "Pesticide Management and Disposal; Standards for Pesticide Containers and Containment:

We have adopted the exact language set forth in PRN 2007-4.

This notification is consistent with the guidance in PR Notice 2007-4 and the requirements of EPA's regulations at 40 CFR 156.10, 156.140, 156.144, 156.146, and 156.156. 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 the amended label is not consistent with the requirement of 40 CFR 156.10, 156.140, 156.144, 156.146, and 156.156, 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.

B. Pesticide Registration (PR) Notice 98-10:

We have updated the label warranty statement in accordance to the EPA's October 17, 2006 Guidance on Warranty Statements.

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:

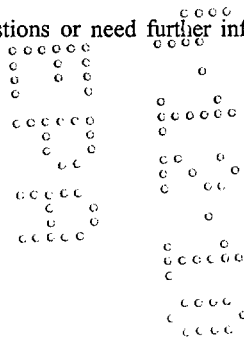
1. Application for Pesticide (EPA Form 8570-1)
2. One copy of the proposed label with changes highlighted
3. One clean copy of the proposed label

Please call me at 1-800-242-1166, Ext. 2455 or via email: eric.smith@spectrumbrands.com, if you have questions or need further information.
Thank you very much for your attention to our application.

Sincerely,



Eric D. Smith
Regulatory Affairs Manager



Sun & Bug Stuff

INSECT REPELLENT (either in name or stated separately)

NOTIFICATION

MAY - 6 2010

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:** Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. **If partly filled:** Call your local waste agency 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.

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.

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NOTICE: To the extent consistent with applicable law, buyer assumes all responsibility for safety and use not in accordance with directions.

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

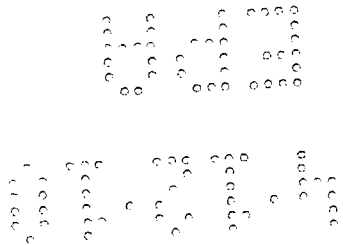
Made in the U.S.A. by WPC Brands, Inc.
P. O. Box 4406
Bridgeton, MO 63044-0406

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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