

APR 1 2003

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

Subject: SB-20 SPF 30 Insect Repellent
EPA Registration No. 305-45
Submission dated July 27, 2000
Application dated June 26, 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 second 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, "Have the product container with you when calling a poison control center or doctor or going for treatment."

3) Add the statement, "For additional information in case of emergency call toll free (insert Telephone Number), to the First Aid block.

4) Change the signal word WARNING to CAUTION.

5) In the Precautionary Statements, change the statement, "Causes substantial but temporary eye injury., to "Causes moderate eye irritation."

6) 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.

7) Place the storage and disposal statements in a box and add the statement, "PESTICIDE STORAGE; store in a cool, dry place inaccessible to children."

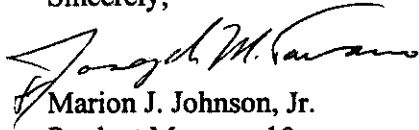
8) In the Hazard To Humans And Domestic Animals section, revise the statement, "Wash hands xxx tobacco.", to read, "Wash hands xxxxx using tobacco or using the toilet."

Re-registration for repellent/sunscreen combination products is deferred until the Agency has solicited comments and views from various governmental agencies and other groups. However, product specific efficacy data will be required. Once the efficacy guidelines are in place, you will be notified of the efficacy requirements.

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,



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



Master Label

SB-20 SPF 30 INSECT REPELLENT (either in name or stated separately)

Keep Out of Reach of Children
WARNING: See back panel for precautions.

ACTIVE INGREDIENTS:	
DEET	20.0%
OTHER INGREDIENTS:	80.0%
TOTAL	100.0%

NET WT __ OZ (__ g)

ACTIVE SUNSCREEN INGREDIENTS:	
Homosalate	Octyl methoxycinnamate
Octyl salicylate	Oxybenzone

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 repellent 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. 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 & 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 waste agency (or 1-800-CLEANUP) for disposal instructions. Never place unused product down any indoor or outdoor drain.

PRECAUTIONARY STATEMENTS:
HAZARDS TO HUMANS - WARNING: Causes substantial but temporary eye injury. Do not get in eyes. Do not apply over cuts, wounds, sunburned, 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, or using tobacco.

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.
305-45

FIRST AID	
If in eye	• 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, 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 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.

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. 305-45	EPA Est. No. 305-W1-1

Optional marketing claims:

- ❖ Combination Insect Repellent and Sunscreen
- ❖ Unscented Protection From Sun and Mosquitoes.
- ❖ Blocks burns and bites 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 Sunscreen (30 SPF) that actually repels mosquitoes, chiggers, gnats!
- ❖ Provides UVA/UVB protection
- ❖ Provides high protection against sunburn
- ❖ High sun protection product
- ❖ For skin highly sensitive to sunburn
- ❖ 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 30
- ❖ Helps prevent sunburn
- ❖ Higher SPF gives more sunburn protection.

Key
❖ 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. <i>Italicized – for informational purposes only.</i>