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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460-0001

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

June 1, 2010

Mr. Eric D. Smith,
Regulatory Affairs Manager
WPC Brands, Inc.
P.O. Box 4406
Bridgeton, MO 63044-0406

**Subject: Amended Label, Response to SAL Dated October 29, 2008
Repel 23 INSECT REPELLENT, EPA Reg. No. 305-50
Your Submission Dated March 9, 2010**

Dear Mr. Smith:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable with the following label revision provision(s):

Storage and Disposal section comment(s):

1. Revise the existing "**PESTICIDE STORAGE:**" subsection to read "Keep this product in its tightly closed original container, when not in use. Store in a cool, dry (preferably locked) area that is inaccessible to children and animals."
2. Revise the existing "**CONTAINER DISPOSAL:**" subsection to read "**CONTAINER HANDLING:** Do not puncture or incinerate! *If empty:* Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. *If partly filled:* Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain."

First Aid Statement section comment(s):

3. Revise the existing 2nd sentence within the "**HOT LINE NUMBER**" subsection to read "For additional information on this product (including health concerns, medical emergencies or pesticide incidents), you may call 1-888-880-1181." ¹

A copy of your label stamped "Accepted with Comments" is enclosed for your records. Please submit two (2) copies of the final printed labeling, incorporating the above changes, before releasing the product for shipment. If these conditions are not complied with, the registration will be subject to cancellation in accordance with section 6(e) of FIFRA. Your release for shipment of the product bearing amended labeling constitutes accepting of these conditions.

If you have any questions about this label review, please contact Mr. Carmen Rodia at (703) 306-0327 or via e-mail at Rodia.Carmen@epa.gov.

Sincerely yours,

For

Richard J. Gebken,
Product Manager (10)
Insecticide Branch
Registration Division (7504P)

Enclosure: Label stamped "Accepted with Comments"

000305-00050 D430460

¹Please note that the "1-888-880-1181" telephone number listed must be available twenty-four (24) hours per day, seven (7) days per week for answering and responding to any medical emergencies or health concerns.

Base Name:

Repel 23

INSECT REPELLENT (either in name or stated separately)

Optional marketing claims:

[Repel 23 Insect Block
23% DEET

Repels: mosquitoes, ticks, biting flies, gnats, fleas & chiggers

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.

Effective, long lasting ((un)scented) protection

(Un)Scented protection

Long Lasting Protection

Repels mosquitoes that may carry West Nile virus]

**ACCEPTED
With COMMENTS
In EPA Letter Dated:
June 11, 2010**

Active Ingredients:	Under the Federal Insecticide, Fungicide and Rodenticide Act, As amended, for the pesticide Registered under EPA Reg:
DEET	100.0%
Other Ingredients	0.0%
Total	100.0%

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This product contains petroleum distillates.

KEEP OUT OF REACH OF CHILDREN

CAUTION See back panel for precautions.

Net Weight 6.5 oz (184 gm)

[Bracketed Text] = Optional Language

Back Labeling

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.**

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/or clothing. Do not use under clothing. 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. Do not apply over cuts, wounds 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 hair.

- For use on outer surfaces of clothing: 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.

[Paragraph format may be used if label is small.]

STORAGE AND DISPOSAL

PESTICIDE STORAGE: Store the product in a cool, dry place that is inaccessible to children.

CONTAINER DISPOSAL: Do not Puncture or Incinerate! **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 for disposal instructions. Never place unused product down any indoor or outdoor drain.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

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

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[Paragraph format may be used if label is small.]

<p>FIRST AID</p> <p>IF SWALLOWED:</p> <ul style="list-style-type: none"> • Immediately call a Poison Control Center or doctor. • Do not induce vomiting unless told to do so by a Poison Control Center or doctor. • Do not give any liquid to the person. • Do not give anything by mouth to an unconscious person. <p>If you suspect a reaction this product:</p> <ul style="list-style-type: none"> • 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. <p>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.</p>
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Physical and Chemical Hazards

FLAMMABLE - Contents under pressure. Keep away from heat, sparks and open flame. Do not puncture or incinerate container. Exposure to temperatures above 130° F may cause bursting.

[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.]

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 USA for
 WPC Brands, Inc.
 PO Box 4406
 Bridgeton, Missouri 63044

EPA Reg. No. 305-50

EPA Est. No. 9608-MO 1

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