

806-22

02/23/2005

1/12

Please read instructions on reverse side before completing form.

Form Approved. OMB No. 2070-0060. Approval expires 05-31-98

	United States Environmental Protection Agency Washington, DC 20460	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number
	Application for Pesticide - Section 1		

1. Company/Product Number Avon Products, Inc./806-22	2. EPA Product Manager Dr. Sheryl Reilly	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name): Avon Skin-So-Soft Bug Guard Plus IR3535 [®] Insect Repellent Gentle Breeze SPF 15 Sunscreen Towelettes Very Water Resistant	PM# 90	
5. Name And Address Of Applicant (Include ZIP Code) Avon Products, Inc. 1251 Avenue of Americas New York, NY 10020	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: NO NOTIFICATION Date Reviewed: <u>2/23/05</u> Reviewed By: <u>CPollard</u>	

Section II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final Printed labels in response to Agency letter dated _____
<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 of alternate composition of packaging and addition of 800 phone contact number on labeling First Aid Box per PR Notice 98-10.

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 the 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 This Product Will Be Packaged In:			
Child Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per Container	If "Yes" Unit Packaging wgt. No. per Container
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(S) Retail Container	5. Location of Label Directions <input type="checkbox"/> On Label <input checked="" 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 checked="" type="checkbox"/> Product is contained in individual labeled packette	

Section IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Alan C. Katz	Title Authorized Representative	Telephone No. (Include Area Code) 703/335-5670
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
2. Signature 	3. Title Authorized Representative	
4. Typed Name Alan C. Katz	5. Date May 27, 2004	

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toXcel

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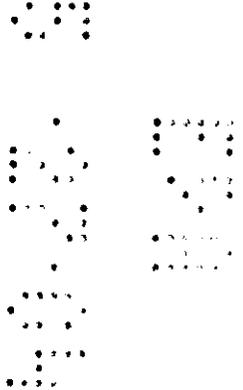
Toxicology & Regulatory Affairs
7545 Presidential Lane
Manassas, VA 20109
USA

Phone: (703) 335-5670

Fax: (703) 335-0089

May 27, 2004

Document Processing Desk (NOTIF)
Attn. Dr. Sheryl Reilly, PM-91
Office of Pesticide Programs (7504C)
Biopesticides and Pollution Prevention Division (7511C)
U.S. Environmental Protection Agency
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202-4501



RE: Notification of Change in Composition of Packaging and Addition of an 800-Number on Label for Avon Skin-So-Soft Bug Guard Plus IR3535[®] Insect Repellent Gentle Breeze[™] Towelette SPF-15 Sunscreen Very Water Resistant; EPA Registration No. 806-22

Dear Dr. Reilly:

Avon Products, Inc. ("Avon") is hereby notifying the Agency of two changes to the above referenced registration that are consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46. No other changes have been made to the labeling or the confidential statement of formula of this product.

The two changes that the Agency is being notified of are:

1. Avon wants the option to use two alternates to the "Avon-KK" (CURLAM[®] Grade 5218-B) foil material of construction for the packages that contain the towelettes. The alternate materials of construction are "Avon-SW" (CURLAM[®] Grade 5221-G) foil and CURLAM[®] Grade 5228-B. Technical bulletins on all three types of foils are attached to this notification. All criteria of PR Notice 98-10 (II)(E), Changes in Packaging and Related Labeling Statements, are met as required for notification.
2. As agreed with the Agency, an "800" phone contact number is added to the First Aid Box of this product's label. See the attached February 26, 2004 commitment letter from Greg Adamson of Avon Products, Inc. and marked up copy highlighting the change to the labeling for both the packettes and the carton/zip lock baggies.

NOTIFICATION for EPA Reg. No. 802-22 (Attn. Dr. Reilly)
May 27, 2004
Page 2 of 2

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Enclosed please find a self-addressed, stamped post card for your convenience in giving notice that this notification has been noted and filed.

Please do not hesitate to contact me by phone at 703-335-5670 or by email at alan@toxcel.com, if you have any questions or require additional information.

Sincerely,



Alan C. Katz, DABT
Authorized Representative of Avon Products Inc.

Enclosures

CC: A. Pechko (Avon)
T. Gilman (Avon)
H. Estreicher (Keller & Heckman)

4/12



February 26, 2004

AVON PRODUCTS, INC.
AVON PLACE
SUFFERN, NY 10901-5605

845 369 2000 TEL

To whom it may concern:

Avon agrees to amend its label copy to include a poison control center phone number in the "First Aid Box" for the following Avon products:

- Avon Skin-So-Soft SSS Bug Guard Plus IR3535® Active Insect Repellent Gentle Breeze™ Towelettes SPF 15 Sunscreen Very Water Resistant (EPA File Symbol 806-EE)
- Avon Skin-So-Soft SSS Bug Guard Plus IR3535® Active Insect Repellent Gentle Breeze™ Towelettes (EPA File Symbol 806-EG)

This amendment will take place on the next production of the label after label the initial EPA approval is achieved. The date of next production will be dependent on sales of the towelettes scheduled to launch in June of 2004.

Thank you for your cooperation in this matter.

Sincerely,

Greg Adamson Ph.D.
Director of Toxicology and Regulatory Affairs
Global Research and Development
Avon Products, Inc.

5/12



A BEMIS COMPANY

2200 Badger Avenue
P.O. Box 2968
Oshkosh, WI 54903-2968

TECHNICAL BULLETIN

Phone 920-303-7300
FAX 920-303-7306

CURLAM[®] GRADE 5218-B
PROTECTIVE PACKAGING FILM
AVON - KK

APPLICATIONS

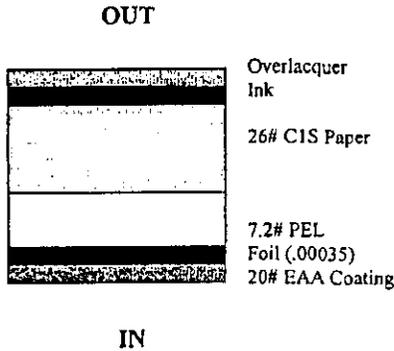
Single service PC Pouch - for samplers.

FEATURES

- No deterioration of interior film to foil bond for six months at ambient conditions
- Minimal foil flex or stress cracking
- Minimal exterior spot foil corrosion.
- Excellent barrier properties
- Superior roll conformation
- Superior cutting ability
- Excellent tearing characteristics for easy opening

MACHINERY

VFFS Equipment, Pouch Machines, Circle, Prodo-Pak



Thickness: 3.8 mil +/- 7.5%

FDA & USDA Status: CURLAM (Grade 5218-B) meets the requirements for a food contact material under the Food Additive Regulations. Curwood has on file statements from suppliers of all materials used, assuring that the items we purchase are in compliance with the appropriate Food Additive Regulation.

FILM SPECIFICATIONS

Basis Wt.: 68.0 #/rm
Yield: 6,352 in²/lb
Seal strength: 3500 gm/in min.
@285°F, 40 psi, 1/2 sec
Heat Seal Range: 280 - 310°F
Bond Strength: 500 gm/in - Foil to Sealant

Barrier Properties

O₂ < .01 CC per 100 in² per 24 Hrs @
73°F & 50% RH

MVTR < .001 gm H₂O per 100 in² per
24 Hrs @ 100°F & 90% RH

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A BEMIS COMPANY

 2200 Badger Avenue
 P.O. Box 2968
 Oshkosh, WI 54903-2968

 Phone 920-303-7300
 FAX 920-303-7306

TECHNICAL BULLETIN

CURLAM[®] GRADE 5221-G Avon-SW

APPLICATIONS

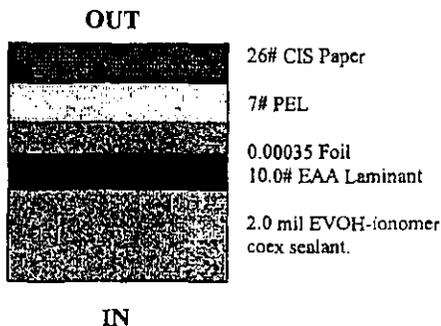
Single service PC Pouch

FEATURES

Reverse register print, ionomer sealant
 No deterioration of interior film to foil bond for six months at ambient conditions
 Minimal foil flex or stress cracking
 Minimal exterior spot foil corrosion
 Excellent barrier properties
 Superior cutting ability
 Excellent tearing characteristics for easy opening

MACHINERY

VFFS Pouch Equipment



Thickness: 5.4 mil

FDA & USDA Status: CURLAM[®](Grade 5221-G) meets the requirements for a food contact material under the Food Additive Regulations. Curwood has on file statements from suppliers of all materials used, assuring that the items we purchase are in compliance with the appropriate Food Additive Regulation.

FILM SPECIFICATIONS

Basis Wt.: 88 #/rm (unprinted)
 Yield: 4,909 in²/lb (unprinted)
 Seal strength: 2500 gm/in @ 300°F,
 40 psi, 1.5 sec
 Bond strength: 350 gm/in - Foil to EAA
 300 gm/in - EAA to Sealant

Barrier Properties

O₂ < .01 CC per 100 in² per 24 Hrs @
 73°F & 0% RH

MVTR < .001 to .06 gm H₂O per 100 in² per
 24 Hrs @ 100°F & 90% RH

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TECHNICAL BULLETIN

Phone 920-303-7300
FAX 920-303-7306

CURLAM[®] GRADE 5228-B
PROTECTIVE PACKAGING FILM

APPLICATIONS

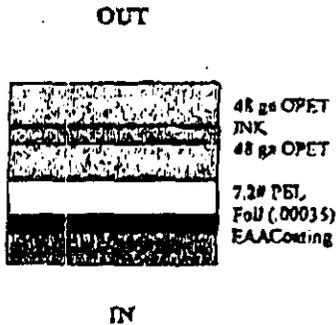
Single service PC Pouch - for samplers.

FEATURES

- No deterioration of interior film to foil bond for six months at ambient conditions
- Minimal foil flex or stress cracking
- Minimal exterior spot foil corrosion
- Excellent barrier properties
- Superior roll conformation
- Superior cutting ability
- Excellent tearing characteristics for easy opening

MACHINERY

VFFS Equipment, Pouch Machines, Circle, Prodo-Pak



Thickness: 3.25 mil +/- 7.5%

FDA & USDA Status: CURLAM (Grade 5228-B) meets the requirements for a food contact material under the Food Additive Regulations. Curwood has on file statements from suppliers of all materials used, assuring that the items we purchase are in compliance with the appropriate Food Additive Regulation.

FILM SPECIFICATIONS

- Basis Wt.: 61.2 #/rm
- Yield: 7,100 in²/lb
- Seal strength: 3500 gm/in min.
@285°F, 40 psi, 1/2 sec
- Heat Seal Range: 280 - 310°F
- Bond Strength: 500 gm/in - Foil to Sealant

Barrier Properties

- O₂ < .01 CC per 100 in² per 24 Hrs @
73°F & 50% RH
- MVTR < .001 gm H₂O per 100 in² per
24 Hrs @ 100°F & 90% RH

5/19/04

Master Label

FRONT OF PACKAGE:

AVON
SKIN-SO-SOFT
S
S
S
BUG GUARD PLUS
IR3535®
ACTIVE
INSECT REPELLENT
GENTLE BREEZE™
TOWELETTES
SPF 15 SUNSCREEN
VERY WATER RESISTANT

MODIFICATION

Date Reviewed: 2/23/05

Reviewed By: CPollard

KEEP OUT OF REACH OF CHILDREN
WARNING

ACTIVE INGREDIENTS:
beta-alanine, n-acetyl-N-butyl-, ethyl ester* / carboxylic acid 7.5%
OTHER INGREDIENTS: 92.5%
TOTAL: 100.0%
*IR3535®

8 TOWELETTES
Total: 2.4 FL. OZ. (80ml)

[10 TOWELETTES]
[Total: 3 FL. OZ. (100 ml)]

BACK OF PACKAGE: (information contained in parentheses is optional label copy language)
[bracketed information confined to use on the Zip Lock Baggie]

REPELLENCY - IR3535® provides effective and dependable repellency against mosquitoes, deer ticks, black flies, gnats, no-seeums, sand flies and biting midges.

SPF 15 VERY WATER RESISTANT - Helps prevent sunburn. Higher SPF gives more sunburn protection. Retains SPF after 80 minutes of sweating or activity in the water. PABA-Free.

SUITABLE FOR THE ENTIRE FAMILY - (Pleasantly scented.) Gentle formula does not need to be washed off when returning from the outdoors. (Dermatologist-tested.) (Hypoallergenic.)

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BACK OF PACKAGE – continued :
(information contained in parentheses is optional label copy language)
[bracketed information confined to use on the Zip Lock Baggie]

DIRECTIONS FOR USE: It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Open package, remove and unfold towelette. Use as many towelettes as necessary to ensure liberal and even coverage before sun and insect exposure. Adults may need to use more than one towelette. An adult must apply this product to children under 10. For continued insect protection, reapply about every 2 hours or sooner if effectiveness diminishes. For sunscreen protection, reapply as needed or after towel drying, swimming or sweating. Do not exceed 9 applications per day.

STORAGE: Store in cool, dry place.

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.

PRECAUTIONARY STATEMENTS: HAZARDS TO HUMANS: Warning. For external use only. Causes substantial but temporary eye injury. Do not get in eyes. Stop use and ask a doctor if rash or irritation develops and lasts. Ask a doctor before using on children under 6 months of age.

FIRST AID	
If in eyes:	<ul style="list-style-type: none">• 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.• Call a poison control center or doctor for treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-FOR-AVON for emergency medical treatment information.	

[WARNING: To avoid danger of suffocation, keep this and all other plastic bags away from babies and children. Do not use in cribs, beds, carriages or playpens. The thin film may cling to nose and mouth and prevent breathing.]

PHYSICAL HAZARDS: FLAMMABLE.
Keep away from heat or open flame.

AVOID CONTACT WITH PLASTICS, COSTUME JEWELRY, LEATHER AND SYNTHETIC FIBERS. MAY DAMAGE PAINTED OR VARNISHED SURFACES, INCLUDING NAIL POLISH.

ACTIVE SUNSCREEN INGREDIENTS:
OCTOCRYLENE (10%)
OCTINOXATE (7.5%)
OCTISALATE (5%)

BACK OF PACKAGE - continued: (information contained in parentheses is optional label copy language)

(To order, see an Avon Representative, or call
1-800-FOR-AVON. www.avon.com)
(IR3535® is a registered trademark of Merck KGaA.)
(Not for sale or use after expiration date.)
EPA Reg. No. 806-22 EPA Est. No. 052631-NJ-001
(Patent Pending)
AVON PRODUCTS, INC., DISTR.
1251 AVE. OF THE AMERICAS, NY, NY 10020
© AVON 200x

Julian Day Lot Code Number
Exp. Month/ Year

Master Label

FRONT OF PACKAGE:

AVON
SKIN-SO-SOFT
S
S
S
BUG GUARD PLUS
IR3535®
ACTIVE
INSECT REPELLENT
GENTLE BREEZE™
TOWELETTE
SPF 15 SUNSCREEN
VERY WATER RESISTANT

ATION
Reviewed By: 2/23/05
cpollard

KEEP OUT OF REACH OF CHILDREN
WARNING

ACTIVE INGREDIENTS:
beta-alanine, n-acetyl-N-butyl-, ethyl ester* / carboxylic acid 7.5%
OTHER INGREDIENTS: 92.5%
TOTAL: 100.0%
*IR3535®

1 TOWELETTE
Total: 0.3 FL. OZ. (10 ml)

BACK OF PACKAGE: (information contained in parentheses is optional label copy language)

REPELLENCY - IR3535® provides effective and dependable repellency against mosquitoes, deer ticks, black flies, gnats, no-seeums, sand flies and biting midges.

SPF 15 VERY WATER RESISTANT - Helps prevent sunburn. Higher SPF gives more sunburn protection. Retains SPF after 80 minutes of sweating or activity in the water. PABA-Free.

(SUITABLE FOR THE ENTIRE FAMILY - Pleasantly scented. Gentle formula does not need to be washed off when returning from the outdoors. Dermatologist-tested. Hypoallergenic.)

DIRECTIONS FOR USE: It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Open package, remove and unfold towelette. Use as many towelettes as necessary to ensure liberal and even coverage before sun and insect exposure. Adults may need to use more than one towelette. An adult must apply this product to children under 10. For continued insect protection, reapply about every 2 hours or sooner if

effectiveness diminishes. For sunscreen protection, reapply as needed or after towel drying, swimming or sweating. Do not exceed 9 applications per day.

STORAGE: Store in cool, dry place.

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.

PRECAUTIONARY STATEMENTS: HAZARDS TO HUMANS. Warning. For external use only. Causes substantial but temporary eye injury. Do not get in eyes. Stop use and ask a doctor if rash or irritation develops and lasts. Ask a doctor before using on children under 6 months of age.

FIRST AID	
If in eyes:	<ul style="list-style-type: none">• 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.• Call a poison control center or doctor for treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-FOR-AVON for emergency medical treatment information.	

PHYSICAL HAZARDS: FLAMMABLE.
Keep away from heat or open flame.

ACTIVE SUNSCREEN INGREDIENTS:

OCTOCRYLENE (10%)
OCTINOXATE (7.5%)
OCTISALATE (5%)

(To order, see an Avon Representative, or call
1-800-FOR-AVON. www.avon.com)
(IR3535® is a registered trademark of Merck KGaA.)
(Not for sale or use after expiration date.)
EPA Reg. No. 806-22 EPA Est. No. 052631-NJ-001
AVON PRODUCTS, INC., DISTR.
1251 AVE. OF THE AMERICAS, NY, NY 10020
© AVON 200x

Julian Day Lot Code Number
Exp. Month/ Year