

806-23

02/22/2005

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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./806-23	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 Towelettes	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: NOTIFICATION Date Reviewed: <u>2/22/05</u> Reviewed By: <u>[Signature]</u>
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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* No	Unit Packaging Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes No	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper Other
* Certification must be submitted		If "Yes" No. per Unit Packaging wgt. Container	If "Yes" No. per Unit Packaging wgt. 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 package

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
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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
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2. Signature 	3. Title Authorized Representative
4. Typed Name Alan C. Katz	5. Date May 27, 2004

toXcel

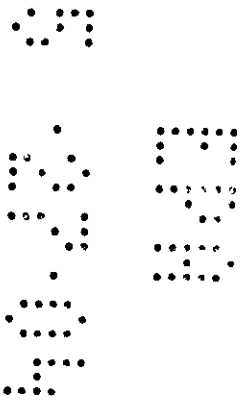
Toxicology & Regulatory Affairs
7545 Presidential Lane
Manassas, VA 20109
USA

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® Active Insect Repellent Gentle Breeze™ Towelette; EPA Registration No. 806-23

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 very comparable 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. 802-23 (Attn. Dr. Reilly)

May 27, 2004

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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)

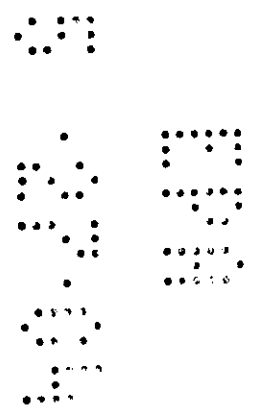
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Master Label

FRONT OF PACKAGE:

AVON
SKIN-SO-SOFT
S
S
S
BUG GUARD PLUS
IR3535®
ACTIVE
INSECT REPELLENT
GENTLE BREEZE™
TOWELETTE

NOTIFICATION
Date Reviewed: 2/22/05
Reviewed By: Spallard



KEEP OUT OF REACH OF CHILDREN
WARNING

ACTIVE INGREDIENTS:	
beta-alanine, n-acetyl-N-butyl-, ethyl ester* / carboxylic acid	7.5%
OTHER INGREDIENTS:	<u>92.5%</u>
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-see-ums, sand flies and biting midges.

(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 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. 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.

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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.

(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. 806-23 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

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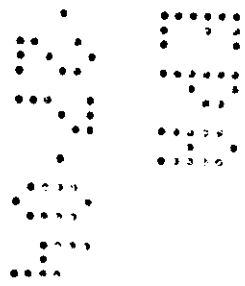
Master Label

NOTIFICATION

Date Reviewed: 2/22/05
Reviewed By: CPallard

FRONT OF PACKAGE:

AVON
SKIN-SO-SOFT
S
S
S
BUG GUARD PLUS
IR3535®
ACTIVE
INSECT REPELLENT
GENTLE BREEZE™
TOWELETTES



KEEP OUT OF REACH OF CHILDREN
WARNING

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

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

[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-see-ums, sand flies and biting midges.

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 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. Do not exceed 9 applications per day.

STORAGE: Store in cool, dry place.

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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]

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.

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. 806-23 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
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