

806-30

11-9-2007

117



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

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

NOV 9 2007

Mr. J. Michael Kelley, Ph.D. / toXcel, LLC  
Avon Authorized Representative  
Avon Products, Inc.  
1251 Avenue of the Americas  
New York, NY 10020

RE: Notification of revisions to the Storage and Disposal – PR Notice 2007-1  
EPA Registration Number: 806-30  
Date of Submission: October 5, 2007

Dear Mr. O'Byrne:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated October 5, 2007, for the product Avon Skin-So-Soft SSS Bug Guard Plus Picaridin Insect Repellent Towelettes. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the actions requested fall within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records.


If you have any questions, please call me directly at 703-305-6249 or Joyce Edwards of my staff at 703-308-5479.

Sincerely,

A handwritten signature in black ink, appearing to be "Linda Arrington".

Linda Arrington  
Notifications & Minor Formulations Team Leader  
Registration Division (7505P)  
Office of Pesticide Programs

2/7

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

1. Company/Product Number <b>Avon Products, Inc. / 806-30</b>	2. EPA Product Manager <b>Richard Gebken</b>	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) <b>Avon Skin-So-Soft SSS Bug Guard Plus Picaridin Insect Repellent Towelettes</b>	PM# <b>10</b>	
5. Name And Address Of Applicant (Include ZIP Code) <b>Avon Products, Inc.                  1251 Avenue of the Americas                  New York, NY 10020</b> <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

**Section II**

<input type="checkbox"/> Amendment – Explain below. <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input checked="" type="checkbox"/> Notification – Explain below.	<input type="checkbox"/> Final Printed labels in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application. <input type="checkbox"/> Other – Explain Below.
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NOTIFICATION  
NOV - 9 2007

**Explanation:** Use additional page(s) if necessary. (For section I and Section II.)

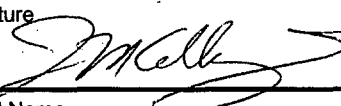
Notification of revisions to the storage and disposal section per PR Notice 2007-1.

Notification of label change relative to PR Notice 2007-1. This notification is consistent with the guidance in PR Notice 2007-1 and the requirements of EPA's regulations at 40 CFR 156.10 and 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 2007-1 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 <b>* Certification must be submitted</b>	Unit Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If "Yes"                      No. per Unit Packaging wgt.      Container 0.3 fl oz (10 mL)/packette    8 or 10	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes"                      No. per Unit Packaging wgt.      Container	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input checked="" type="checkbox"/> Other (Specify) <u>foil packette</u>
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(S) Retail Container 2.4 fl oz (8 packettes/container) 3.0 fl oz (10 packettes/container)	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 checked="" type="checkbox"/> Lithographed <input checked="" type="checkbox"/> Product is Contained in Individual Labeled Packette <input type="checkbox"/> Paper glued                                      *Label is affixed to both individual packettes and bag of packettes. <input type="checkbox"/> Stenciled			

**Section IV**

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name <b>J. Michael Kelley, Ph.D. / toXcel, LLC</b>	Title <b>Avon Authorized Representative</b>	Telephone No. (Include Area Code) <b>(703) 335-5670</b>
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 <b>Avon Authorized Representative (toXcel, LLC)</b>	
4. Typed Name <b>J. Michael Kelley, Ph.D.</b>	5. Date <b>October 5, 2007</b>	

# toXcel

Toxicology & Regulatory Affairs

P.O. Box 363

7140 Heritage Village Plaza

Gainesville, VA 20156

USA

Phone: (703) 335-5670

Fax: (703) 310-6950

## Hand Delivery

October 5, 2007

Richard Gebken, PM-10  
Document Processing Desk (NOTIF)  
Registration Division  
Office of Pesticide Programs - (7504P)  
U.S. Environmental Protection Agency  
Room S-4900, 4<sup>th</sup> Floor, One Potomac Yard  
2777 South Crystal Drive  
Arlington, VA 22202-4501

RE: Notification of Revision of Storage and Disposal Labeling for *Avon Skin-So-Soft SSS Bug Guard Plus Picaridin Insect Repellent Towlettes*;  
EPA Registration No. **806-30**

Dear Mr. Gebken:

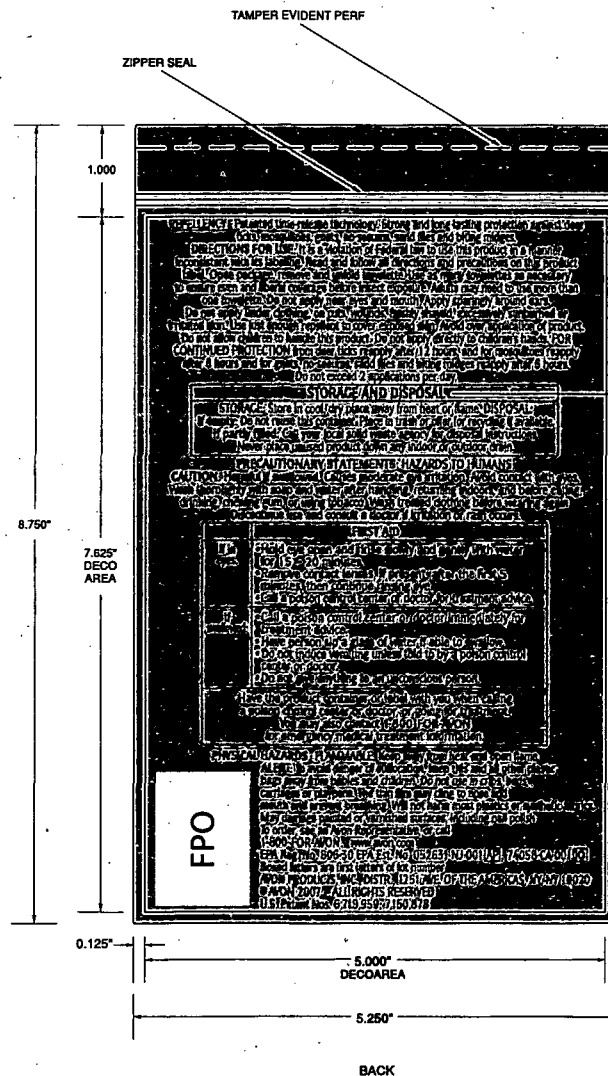
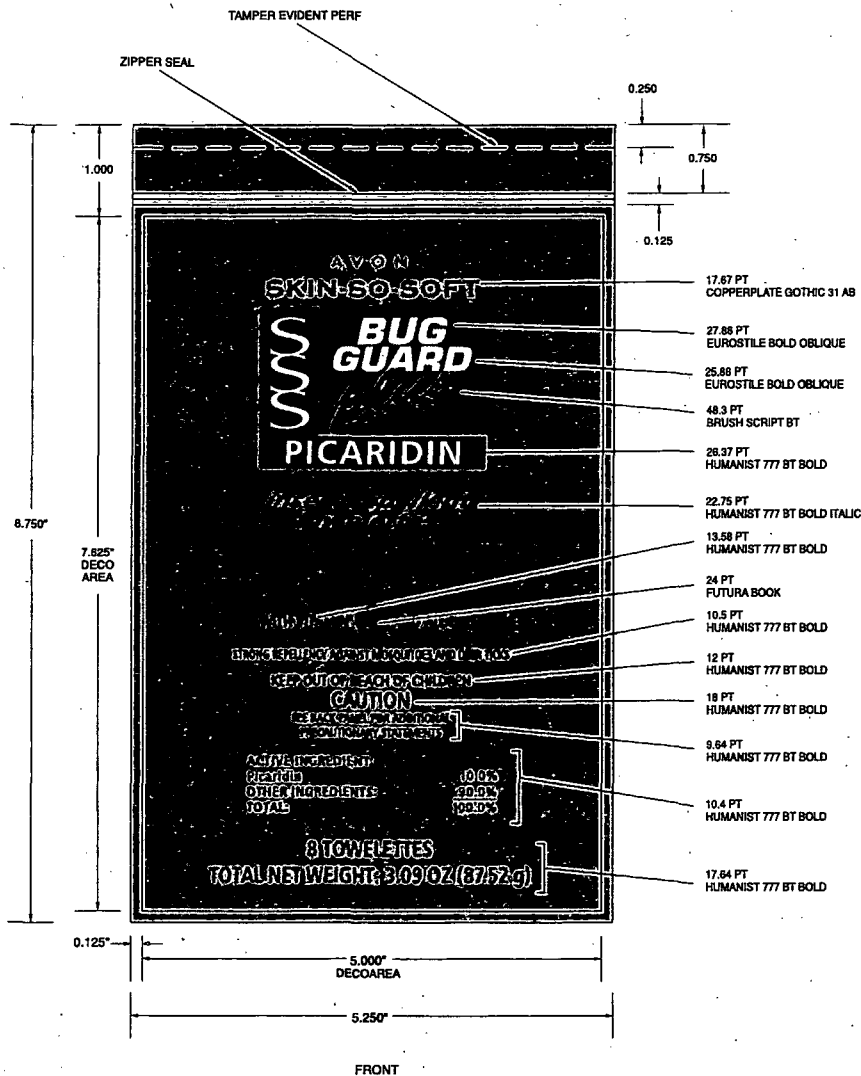
In accordance with Pesticide Registration (PR) Notice 2007-1, the registrant is formally submitting this notification of revisions in the storage and disposal section of the product label, as indicated on the enclosed Notification (EPA Form 8570-1). It is understood that this PR Notice provides guidance for the revision of the storage and disposal section of Non-Antimicrobial Residential or Household use products. Further, the Notice advises that the use of toll-free telephone numbers or websites in the disposal section is voluntary. The registrant has revised the disposal statement of the product label for the above referenced product to read, "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 for disposal instructions. Never place unused product down any indoor or outdoor drain."

The Agency was previously notified of this product's label change per PR Notice 2007-1 on May 25, 2007; however at that time, there was a pending amendment action to add a claim of repellency of deer ticks to the product label. As of June 28, 2007, the most recent EPA-stamped accepted label displays all the correct repellency claims and this notification serves to change the storage and disposal section of the most recent approved product label.



NOTIFICATION

NOV - 9 2007



GRAPHICS:  
WHITE  
BLUE/GREEN - PMS 17-5034 TP  
RED - PMS 17-1482 TP  
YELLOW - PMS 14-1168 TP  
SILVER - PMS 877C

PLEASE NOTE: ALL COLORS IN THIS ELECTRONIC FILE ARE FOR VISUALIZATION AND COLOR BREAK PURPOSES ONLY! USE ACTUAL SWATCHES, CHIPS OR CHIP SPECIFICATIONS TO MATCH COLORS WHEN PRINTING.

SEE LAYERING BOX FOR ACTUAL BREAKDOWN

NOTE TO PRINTER:  
• SMALLEST FONT SIZE ON FILE IS 9.64 PT

DESIGN CODE:	PERSONAL CARE	DATE:	09/29/07
JOB NAME:	SSS BGP PICARIDIN POLYBAG - FRONT		
PROFILE:	187944A		
REV DATE:	04/17/07	ADDED COLOR/TEXT GRAPHIC	
STUDIO:	UPM/SHENNY DESIGN		
FONT/SPE:	HELVETICA, FUTURA, COPPERPLATE GOTHIC 31 AB, EUROSTILE (ALL ABOVE), HUMANIST 777 BT BRUSH SCRIPT BT		
PROGRAM:	ADOBE ILLUSTRATOR CS2 (17.0.1)		
DESIGNER:			
COPYWRITER:			
ENGINEER:			
MANAGER:			
SUPPLIER:	CLARKING		

GRAPHICS:  
WHITE  
BLUE/GREEN - PMS 17-5034 TP  
SILVER - PMS 877C

PLEASE NOTE: ALL COLORS IN THIS ELECTRONIC FILE ARE FOR VISUALIZATION AND COLOR BREAK PURPOSES ONLY! USE ACTUAL SWATCHES, CHIPS OR CHIP SPECIFICATIONS TO MATCH COLORS WHEN PRINTING.

SEE LAYERING BOX FOR ACTUAL BREAKDOWN

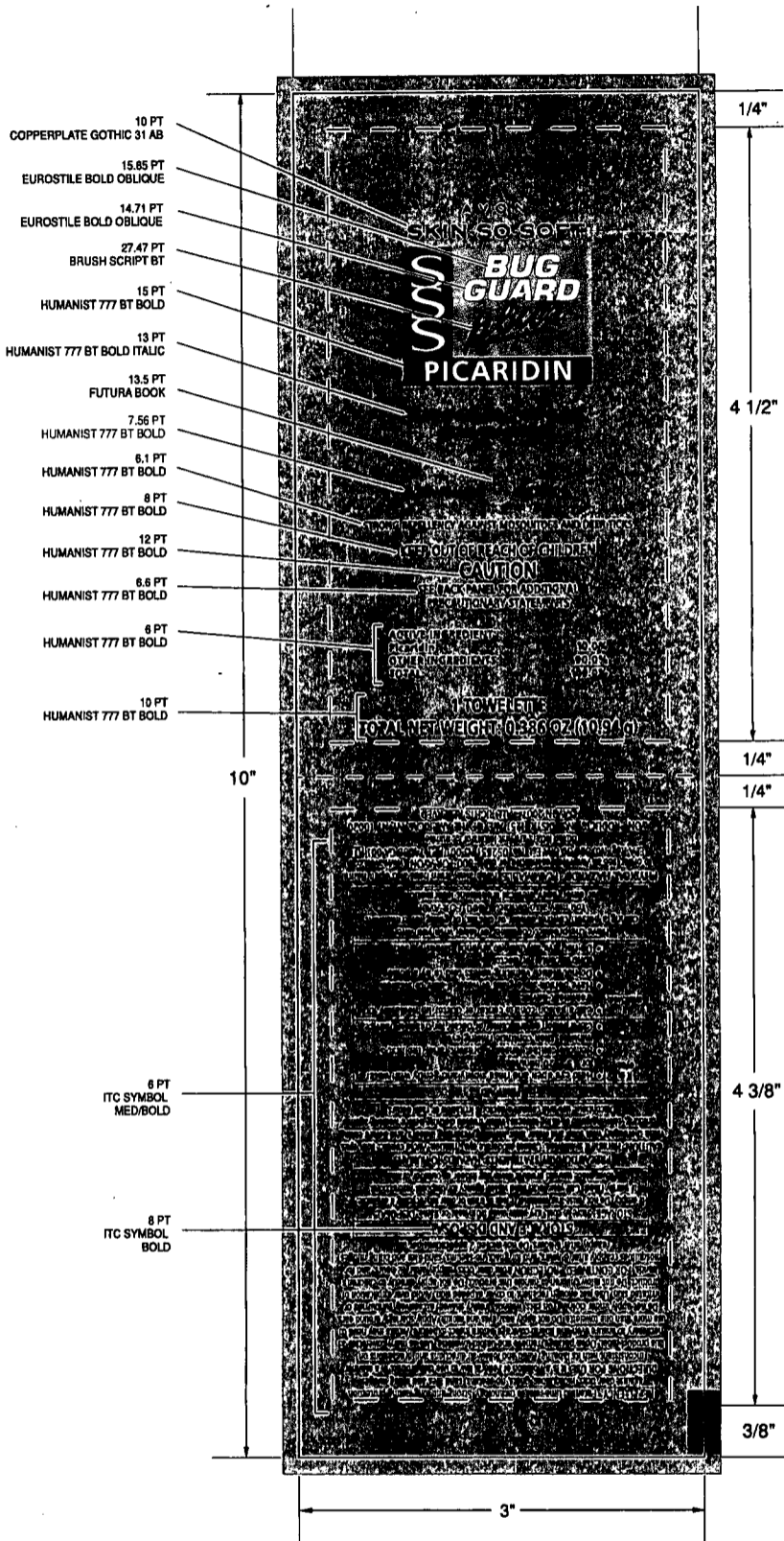
NOTE TO PRINTER:  
• SMALLEST FONT SIZE ON FILE IS 10.12 PT  
• BARCODE PRINTS BLUE/GREEN - PMS 17-5034 TP ON WHITE BACKGROUND

DESIGN CODE: PERSONAL CARE  
JOB NAME: SSS BGP PICARIDIN POLYBAG - FRONT  
PROFILE: 187944A  
REV DATE: 04/17/07

STUDIO: UPM/SHENNY DESIGN  
FONT/SPE: HELVETICA, FUTURA, COPPERPLATE GOTHIC 31 AB, EUROSTILE (ALL ABOVE), HUMANIST 777 BT BRUSH SCRIPT BT  
PROGRAM: ADOBE ILLUSTRATOR CS2 (17.0.1)

DESIGNER:  
COPYWRITER:  
ENGINEER:  
MANAGER:  
SUPPLIER:

SSS BGP PICARIDIN TOWELETTES (17516)  
NC/TT



GRAPHICS:  
WHITE  
BLUE/GREEN - PMS 17-5034 TP  
RED - PMS 17-1462 TP  
YELLOW - PMS 14-1159 TP  
SILVER - PMS 877C

PLEASE NOTE: ALL COLORS IN THIS  
ELECTRONIC FILE ARE FOR VISUALIZATION  
AND COLOR BREAK PURPOSES ONLY!  
USE ACTUAL SWATCHES, CHIPS OR  
CHIP SPECIFICATIONS TO MATCH COLORS  
WHEN PRINTING.

SEE LAYERING BOX FOR ACTUAL BREAKDOWN

NOTE TO PRINTER:  
SMALLEST FONT SIZE ON FILE IS 6 PT

BUSIN. UNIT:	PERSONAL CARE	DATE:	11/01/06
JOB NAME:	SSS BGP PICARIDIN TOWELETTES		
PROFILE#:	1029446		
REV DATE:	03/23/07 - COPY REVISED		
	04/09/07 - BACK COPY REVISED		
	04/19/07 - ADDED DROPLE-GRAFIX		
	07/12/07 - REVISED COPY		
STUDIO:	LUKASIEWICZ DESIGN		
FONT/SPEC:	HELVETICA, FUTURA, COPPERPLATE GOTHIC 31 AB, ITC SYMBOL, EUROSTILE (ALL ADOBE), HUMANIST 777 BT, BRUSH SCRIPT BT		
PROGRAM:	ADOBE ILLUSTRATOR CS2 (12.0.1)		
DESIGNER:	●●●●●		
COPYWRITER:	●●●●●		
ENGINEER:	●●●●●		
MARKETING:	●●●●●		
SUPPLIER:	●●●●● DRAWING#:		

4/9



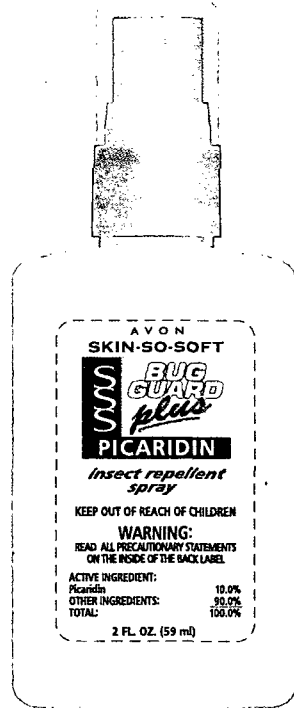
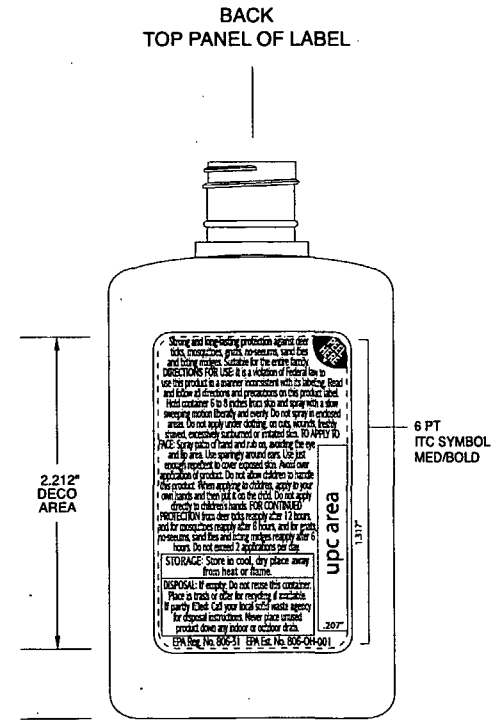
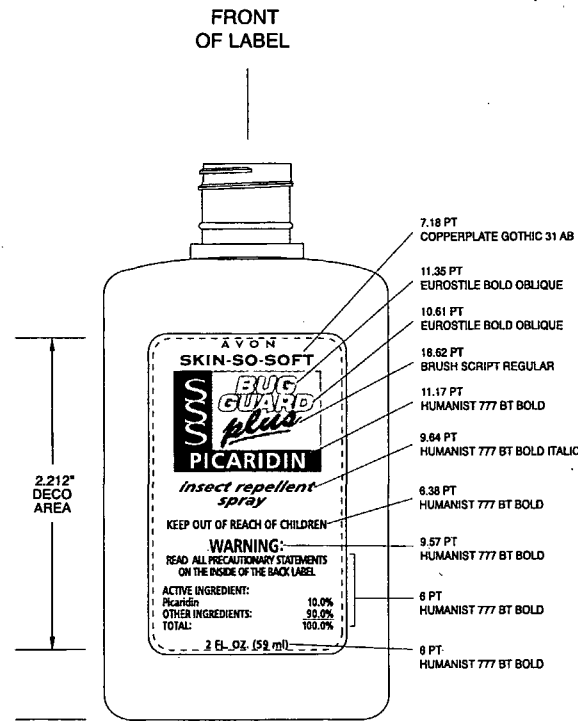


ILLUSTRATION TO SHOW  
GRAPHICS ON BOTTLE  
ENGINEER PRODUCT REFERENCE  
FOR VISUALIZATION ONLY!



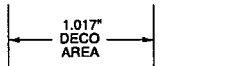
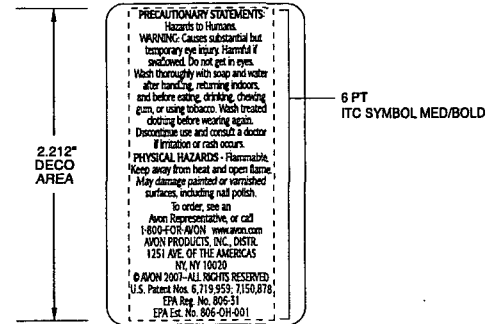
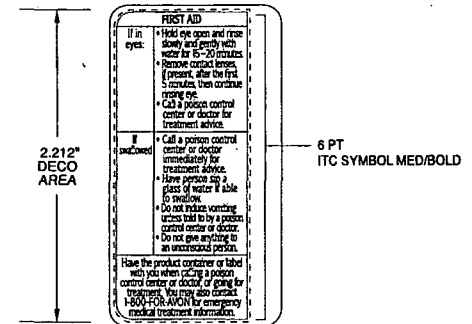
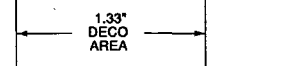
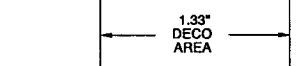
BOTTLE - PEARL SILVER

GRAPHICS:  
WHITE  
BLUE/GREEN - PMS 17-5034 TP  
RED-PMS 17-1462 TP  
YELLOW-PMS 14-1159 TP

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WHEN PRINTING.

SEE LAYERING BOX FOR ACTUAL BREAKDOWN

NOTE TO PRINTER:  
SMALLEST FONT SIZE ON FILE IS 6 PT



BUSIN. UNIT:	PERSONAL CARE	DATE:	12/14/06
JOB NAME:	SSS BGP PICARIDIN 2 OZ		
PROFILE#:	1045078		
REV DATE:	01/23/07	BARCODE ADDED	
	02/09/07	US PATENT No. UPDATED	
	03/26/07	REVISED DISPOSAL STATEMENT	
	08/20/07	REVISED COPY	
STUDIO:	LUKASIEWICZ DESIGN		
FONT/SPEC:	HELVETICA, FUTURA, EUROSTILE, ITC SYMBOL, BRUSH SCRIPT, COPPERPLATE GOTHIC 31AB & 33B, HUMANIST 777 (BT)		
PROGRAM:	ADOBE ILLUSTRATOR CS2 (12.0.1)		
DESIGNER:			
COPYWRITER:			
ENGINEER:			
MARKETING:			
SUPPLIER:	DRAWING#:		

44