

806-30 5.23.2008

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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MAY 23 2008

J. Michael Kelley, Ph.D.
toXcel, Toxicology and Regulatory Affairs
P.O. Box 363
7140 Heritage Village Plaza
Gainesville, VA 20156

Subject: Label Notifications for Pesticide Registration Notice 2007-4

Dear Dr. Kelley,

The Agency is in receipt of your Applications for Pesticide Notification under Pesticide Registration Notice (PRN) 2007-4 dated May 8, 2008 for the following products:

**Avon Skin-So-Soft SSS Bug Guard Plus
Picaridin Insect Repellent Towelettes
Avon Skin-So-Soft SSS Bug Guard Plus
Picaridin Insect Repellent Spray**

EPA Registration Number 806-30

EPA Registration Number 806-31

Per your letter, these applications for pesticide notification replace notification applications for these products which were submitted on April 14, 2008.

The Registration Division (RD) has conducted its review of these requests for their applicability under PRN 2007-4 and finds that the label changes requested fall within the scope of PRN 2007-4. The labels submitted with the application have been stamped "Notification" and will be placed in our records.

Please be reminded that 40 CFR Part 156.140(a)(4) requires that a batch code, lot number, or other code identifying the batch of the pesticide distributed and sold be placed on nonrefillable containers. The code may appear either on the label (and can be added by non-notification/PR Notice 98-10) or durably marked on the container itself.

If you have any questions, please call me directly at 703-305-6249 or Steve Schaible of my staff at 703-308-9362.

Sincerely,



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

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	United States Environmental Protection Agency 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 Avon Products, Inc. / 806-30	2. EPA Product Manager Richard Gebken	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Avon Skin-So-Soft SSS Bug Guard Plus Picaridin Insect Repellent Towelettes	PM# 10	
5. Name And Address Of Applicant (Include ZIP Code) Avon Products, Inc. 1251 Avenue of the Americas New York, NY 10020 <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"/> 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 revisions to the storage and disposal section per PR Notice 2007-4. This Notification replaces the Notification filed with the Agency on April 14, 2008.

Notification of label change relative to PR Notice 2007-4. This notification is consistent with the guidance in PR Notice 2007-4 and the requirements of EPA's regulations at 40 CFR 156.10, 156.140, 156.144, 156.146, and 156.156. 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 the amended label is not consistent with the requirements of 40 CFR §§ 156.10, 156.140, 156.144, 156.146, and 156.156, 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 <input checked="" type="checkbox"/> 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 checked="" type="checkbox"/> Other (Specify) <u>foil packette</u>
* Certification must be submitted If "Yes" No. per Unit Packaging wgt. Container 0.3 fl oz (10mL)/packette 8 or 10		If "Yes" No. per Unit Packaging wgt. Container	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(S) Retail Container 3.1 oz (8 packettes/container) 3.9 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 type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled <input checked="" type="checkbox"/> Other – Product is Contained in Individual Labeled Packette *Label is affixed to both individual packettes and a bag of packettes.	

Section IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application?)		
Name J. Michael Kelley, Ph.D. / toXcel, LLC	Title Avon 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 Avon Authorized Representative (toXcel, LLC)		
4. Typed Name J. Michael Kelley, Ph.D.		
5. Date May 8, 2008		

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toXcel

Toxicology & Regulatory Affairs

P.O. Box 363

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USA

Phone: (703) 335-5670

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Hand Delivery

May 8, 2008

Richard Gebken, PM-10
Document Processing Desk (NOTIF)
Registration Division
Office of Pesticide Programs - (7504P)
U.S. Environmental Protection Agency
Room S-4900, 4th 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 Towelettes*;
EPA Registration No. **806-30**

Dear Mr. Gebken:

In accordance with Pesticide Registration (PR) Notice 2007-4, the registrant is formally submitting this notification of revisions to 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 for all pesticide products to comply with the new container regulations located in 40 CFR Part 156.

Please Note: It is extremely important to identify that this Notification replaces the Notification filed on April 14, 2008 for the same product. The previous Notification submitted included product labeling that contained an erroneous word in the Storage and Disposal section. On the previous label, the Storage and Disposal section concluded with the following phrase: "Never place any unused product down any indoor or outdoor drain." The label enclosed has been corrected to remove the extra "any" that occurred early in the sentence in order to align with current Agency guidance.

The remainder of the enclosed label is identical to the version previously submitted on April 14, 2008. Per the guidance in PR Notice 2007-4, the registrant has revised the disposal statement of the product label for the above

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FRONT OF CONTAINER:

AVON
SKIN-SO-SOFT
S
S
S
BUG GUARD PLUS
PICARIDIN
INSECT REPELLENT TOWELETTE(S)

[ALTERNATE BRAND NAME #1:]

AVON
SKIN-SO-SOFT
S
S
S
PICARIDIN
INSECT REPELLENT TOWELETTE(S)

[ALTERNATE BRAND NAME #2:]

AVON
BUG GUARD PLUS
PICARIDIN
INSECT REPELLENT TOWELETTE(S)

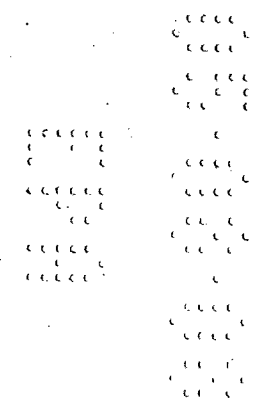
KEEP OUT OF REACH OF CHILDREN
CAUTION
See back panel for additional precautionary statements

ACTIVE INGREDIENT:	
Picaridin	10.0%
OTHER INGREDIENTS:	90.0%
TOTAL:	100.0%

1 TOWELETTE
Total Net Weight: 0.386 oz (10.94 g)

[8 TOWELETTES]
[Total Net Weight: 3.09 oz (87.52 g)]

[10 TOWELETTES]
[Total Net Weight: 3.86 oz (109.4 g)]



[Text within brackets is optional and may appear on the back of container label]

BACK OF CONTAINER:

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. Open package, remove and unfold towelette. Use as many towelettes as necessary to ensure even and liberal coverage before insect exposure. Adults may need to use more than one towelette. Do not apply near eyes and mouth. Apply sparingly around ears. Do not apply under clothing, on cuts, wounds, freshly shaved, excessively sunburned or irritated skin. Use just enough repellent to cover exposed skin. Avoid over application of product. Do not allow children to handle this product. Do not apply directly to children's hands. FOR CONTINUED PROTECTION from deer ticks reapply after 12 hours, and for mosquitoes reapply after 8 hours, and for gnats, no-seeums, sand flies and biting midges reapply after 6 hours. Do not exceed 2 applications per day.

STORAGE: Store in cool, dry place away from heat or flame.
DISPOSAL: **If empty:** Nonrefillable container. Do not reuse or refill 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. Caution: Harmful if swallowed. Causes moderate eye irritation. Avoid contact with eyes. Wash thoroughly with soap and water after handling, returning indoors, and before eating, drinking, chewing gum, or using tobacco. Wash treated clothing before wearing again. Discontinue use and consult a doctor if irritation or rash occurs.

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.
If swallowed	<ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to by a poison control center or doctor. • Do not give anything to an unconscious person.
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 and open flame.

[ALERT: 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.]

To order, see an Avon Representative, or call 1-800-FOR-AVON. www.avon.com
 EPA Reg. No. 806-30
 EPA Est. No. [052631-NJ-001] **AP**, 052631-NJ-001, 74058-CA-001 **IO**, 74058-CA-001, 806-OH-001]
 [Boxed letters are first letters of lot number]
 AVON PRODUCTS, INC., DISTR.
 1251 AVE. OF THE AMERICAS, NY, NY 10020
 © AVON 200X [- ALL RIGHTS RESERVED]

Day Lot Code
 Exp. Year / Month

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[Note to reviewer: The following statements, including those within brackets, are optional AND may appear on the product label AND / OR in marketing collateral materials AND the use of punctuation marks for each statement is optional]

Contains Vitamin E

With Vitamin E

Vitamin E

Contains Aloe

With Aloe

Aloe

Contains Vitamin E & Aloe

(Contains) Bayrepel®

Bayrepel® is a registered trademark of Lanxess

U.S. Patent No. 6,719,959 and 7,150,878

Gentle Breeze™ Scent

Gentle Breeze™

Pleasantly scented

Easy to apply

Wipe on protection

Convenient [towelette] [wipe] for easy application

Convenient [towelettes] [wipes] for easy application

Portable protection

(Towelettes) (Wipes) will not dry out

Non-oily

Not oily

Non-greasy

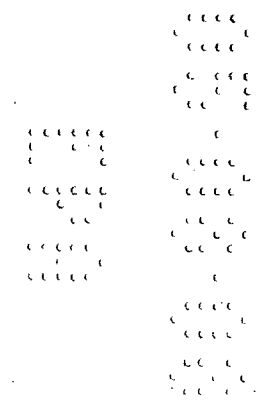
Not Greasy

Light feel

Quick drying

Fast drying

Will not harm most plastics or synthetic fabrics



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May damage painted or varnished surfaces, including nail polish

For active [family] lifestyles

All day protection from mosquitoes

All day protection from deer ticks

All day protection from mosquitoes and deer ticks

Suitable for the [entire] [whole] family

Provides the whole family with an effective [broad-spectrum] outdoor insect repellent

Protection for the [entire] [whole] family

Strong protection for the [entire] [whole] family

[Strong] [Dependable] Protection

Effective, dependable protection

Provides strong and dependable [protection] [repellency]

[Repellency -] Avon's exclusive formula [with Picaridin] provides strong and dependable [repellency] [protection] against deer ticks, mosquitoes, gnats, no-seeums, sand flies and biting midges

[Repellency -] Patented technology that provides strong and dependable [repellency] [protection] against deer ticks, mosquitoes, gnats, no-seeums, sand flies and biting midges

Exclusive patented technology

Exclusive patented enhanced duration technology

Exclusive patented time-release technology

Patented time-release technology

Time-release formula

Time-release

Patented controlled-release technology

Controlled-release formula

Controlled-release

Creates an effective barrier of protection to repel [insects] [mosquitoes] [deer ticks] [mosquitoes and deer ticks] [gnats, no-seeums, sand flies and biting midges]

Strong and long-lasting [repellency] [protection] against mosquitoes [for] [up to] 8 hours

Strong and long-lasting [repellency] [protection] against deer ticks [for] [up to] 12 hours

Strong and long-lasting [repellency] [protection] against mosquitoes [for] [up to] 8 hours and deer ticks [for] [up to] 12 hours

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Strong [repellency] [protection] against deer ticks, mosquitoes, gnats, no-seeums, sand flies and biting midges

Long-lasting [repellency] [protection] against deer ticks, mosquitoes, gnats, no-seeums, sand flies and biting midges

Strong and long-lasting [repellency] [protection] against deer ticks, mosquitoes, gnats, no-seeums, sand flies and biting midges

Repels gnats, no-seeums, sand flies and biting midges

Repels gnats, no-seeums, sand flies and biting midges up to 6 hours

Repels gnats, no-seeums, sand flies and biting midges for 6 hours

Strong [repellency] [protection] against mosquitoes

Long-lasting [repellency] [protection] against mosquitoes

Prevents mosquitoes from biting [for 8 hours]

Strong [repellency] [protection] against deer ticks

Long-lasting [repellency] [protection] against deer ticks

Strong [repellency] [protection] against mosquitoes and deer ticks

Repels mosquitoes

Repels mosquitoes up to 8 hours

Repels mosquitoes for 8 hours

Repels deer ticks

Repels deer ticks up to 12 hours

Repels deer ticks for 12 hours

Repels deer ticks that may [carry] [transmit] Lyme Disease up to 12 hours

Repels deer ticks that may [carry] [transmit] Lyme Disease for 12 hours

Repels deer ticks that may [carry] [transmit] Lyme Disease

Made in the USA

