



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

OFFICE OF
CHEMICAL SAFETY
AND POLLUTION PREVENTION

NOV 28 2012

J. Michael Kelley, Ph.D.
Authorized Representative for
Avon Products, Inc.
c/o to Xcel
P.O. Box 363
7140 Heritage Village Plaza
Gainesville, VA 20156

Subject: Label Notification(s) for Pesticide Registration 98-10

Dear Dr. Kelley,

Subject: Notification to Add Container Size
EPA Registration Number: 806-30
Date of Submission: July 16, 2012

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated July 16, 2012 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 action(s) requested fall within the scope of PRN 98-10. The Confidential Statement of Formula (CSF) and/or label submitted with the application has (have been stamped "Notification" and will be placed in our records.

If you have any questions, please contact Melody Banks on 703 305-5413 or via E-mail at banks.melody@epa.gov.

Sincerely,

A handwritten signature in black ink that reads "Richard A. Gebken".

Richard Gebken
Product Manager
Insecticide Branch
Registration Division (7504P)

	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 to add additional container sizes for Avon Skin-So Soft SSS Bug Guard Picaridin Insect Repellent Towellette; (EPA Reg. No. 806-30)

Section III

1. Material This Product Will Be Packaged In:				2. Type of Container	
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		<input type="checkbox"/> Metal	<input type="checkbox"/> Plastic
* Certification must be submitted				<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
If "Yes" Unit Packaging wgt. 1 – 25 Towelletes		No. per Container	If "Yes" Unit Packaging wgt.	<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 1 Single Towelette (0.386 oz.) – 25 Towelettes (9.65 oz.)		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"/> Product is Contained in Individual Labeled Packette *Label is affixed to both individual packettes and 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 7/16/2012

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toXcel

Toxicology & Regulatory Affairs
P.O. Box 363
7140 Heritage Village Plaza
Gainesville, VA 20156
USA

Phone: (703) 754-0248

Fax: (703) 310-6950

Hand Delivery

July 16, 2012

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 to add additional container sizes for *Avon Skin-So-Soft*
SSS Bug Guard Plus Picaridin Insect Repellent Towelette
(EPA Reg. No. 806-30)**

Dear Mr. Gebken:

On behalf of Avon Products, Inc. of New York, New York, we are submitting the enclosed Application Form (EPA Form 8570-1) to notify the Agency of additional container sizes for the above referenced product.

If you have any questions, please do not hesitate to contact me by phone at 703-754-0248 x112 or by email at Mike.Kelley@toxcel.com.

Sincerely,



J. Michael Kelley, Ph.D.
Vice President
Authorized Representative of Avon Products, Inc.

Enclosures

cc: A. Pechko (Avon)

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FRONT OF CONTAINER:

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

NOTIFICATION

NOV 28 2012

[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)]

[25 TOWELETTES]

[Total Net Weight: 9.65 oz (273.5 g)]

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[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]

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AVON PRODUCTS, INC., DISTR.
 1251 AVE. OF THE AMERICAS, NY, NY 10020
 © AVON 200X [- ALL RIGHTS RESERVED]

Day Lot Code
 Exp. Year / Month

[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

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Quick drying

Fast drying

Will not harm most plastics or synthetic fabrics

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

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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

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 mosquitoes that may [carry] [transmit] West Nile Virus up to 8 hours

Repels mosquitoes that may [carry] [transmit] West Nile Virus for 8 hours

Repels mosquitoes that may [carry] [transmit] West Nile Virus

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

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DRAFT MASTER LABEL FOR EPA REG. NO. 3-30
05/08/0811/09/12

AVON SKIN SO SOFT SSS BUG GUARD PLUS PICARIDIN INSECT REPELLENT TOWELETTE (BAGGIE & PACKET)

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

Made in the USA