

806-31

11-9-2007

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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: 806-31  
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 Spray. 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 read "Linda Arrington".

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

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	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. / 806-31</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 Spray</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**

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**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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes"      No. per Unit Packaging wgt.      Container	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 checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(S) Retail Container <b>0.85 fl. oz – 16 fl. oz.</b>	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 <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

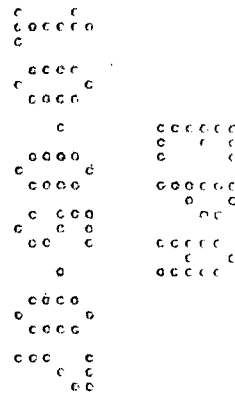
Phone: (703) 335-5670

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 Spray*;  
EPA Registration No. **806-31**

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."

As required, three (3) copies of the label are enclosed. The labels are on standard legal 8.5 x 14-in paper; however, an electronic copy is being provided on the enclosed CD for ease of viewing. It is important to clarify that two sets of labels are included in this notification. One set is the labeling for the standard container (i.e. 4 ounces) and the second set of labeling is for the travel size container (i.e. 2 ounces). The Agency was previously notified of the smaller travel size container in a Notification filed on January 26, 2007.



