

MAR 1 2005

Julie B. Schlekau
McLaughlin Gormley King Company
8810 Tenth Avenue North
Minneapolis, MN 55427-4372

Subject: Revised Label For:
AQUAPEL 25% DEET Insect Repellent Pump Spray 27411
EPA Registration No. 1021-1706
Application received August 23, 2004
Letter dated August 19, 2004

Dear Ms. Schlekau:

The proposed amendment to the registration for the product cited above under The Federal Insecticide, Fungicide And Rodenticide Act, as amended revising the label by adding an 8 hour duration claim is acceptable subject to the comments listed below:

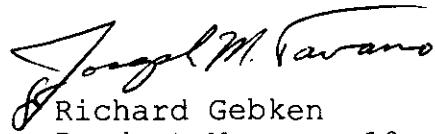
- 1) The claims, "Repels mosquitoes for 8 hours." and "Provides Up To 8 hours Protection From Mosquitoes." are acceptable.
- 2) The claim, "which may carry diseases such as West Nile Virus, encephalitis and dengue" are not acceptable. It must be deleted from the label. This claim must be verified by testing against two vectors of these diseases.
- 3) The claim, "Repels Biting Insects For 8 Hours/Provides Up To 8 Hours Protection.", is not acceptable and must be deleted from the label.
- 4) A 4 hour protection claim for the other pests listed on the label is acceptable.

A stamped copy of the revised draft label is enclosed for your records. Submit two copies of the corrected finished label before the product is released for shipment under this amended label.

A copy of the Efficacy review is enclosed for your records.

If you have any questions please contact Joseph Tavano at (703) 305-6411.

Sincerely,



Richard Gebken
Product Manager 10
Insecticide Branch
Registration Division (7505C)



27411-804



AQUAPEL™ 25% DEET Insect Repellent Pump Spray 27411

ACCEPTED with COMMENTS

8810 Tenth Avenue N. / Minneapolis, Minnesota 55427-4319 U.S.A. In EPA Letter Dated: TELEPHONE (763) 544-0341

MAR 1 2005 Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No. 1021-1706

- Water Based Insect Repellent Formula
New AQUAPEL™ System
Non-VOC Formula
No Strong / Offensive Odor
Leaves No Sticky Residue
Easy To Use Pump Spray Applicator
With Effective DEET Repellent
Repels mosquitoes which may carry diseases such as West Nile Virus, encephalitis and dengue.
Repels Biting Insects For 8 Hours / Provides Up To 8 Hours Protection
Repels Bloodsucking Insect Pests Such As Mosquitoes, Black Flies, Ticks, and Fleas

Table with 2 columns: Ingredient Name and Percentage. Rows include ACTIVE INGREDIENT: DEET (25.00%), OTHER INGREDIENTS (75.00%), and a total of 100.00%.

AQUAPEL™ - Trademark of McLaughlin Gormley King Co.

KEEP OUT OF REACH OF CHILDREN WARNING

FIRST AID

Table with 2 columns: Scenario (IF IN EYES, IF SWALLOWED, IF INHALED, IF YOU SUSPECT A REACTION TO THIS PRODUCT) and First Aid Instructions.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage. Have the product container or label with you when calling a poison control center or doctor or going for treatment.

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING

Causes substantial but temporary eye injury. Harmful if swallowed or inhaled. Do not get in eyes. Avoid breathing spray mist. Use of this product may cause skin reactions in rare cases.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

AQUAPEL™ 25% DEET Repellent Pump Spray 27411 provides up to 8 hours of protection from Mosquitoes and up to 4 hours protection from Black Flies, Stable Flies, Sand Flies, Gnats, Chiggers, Fleas, and Ticks.

Read and follow all directions and precautions on this product label. Hold container upright about 4 to 6 inches from skin or clothing. Do not use as a space spray. Do not spray in enclosed areas. Spray and spread evenly with your hand to moisten all exposed skin. Use just enough repellent to cover exposed skin and/or clothing. Avoid overuse. Frequent reapplication and saturation of clothing are unnecessary for effectiveness. To apply to face, spray palms of hand and apply to cover face. Apply sparingly around ears. Do not apply to eyes and mouth and do not apply to the hands of young children. Do not allow children to handle this product. When using on children, apply to your own hands and then put it on the child. Do not apply over cuts, wounds, or irritated skin. Do not spray directly on the face. Also apply to clothing such as shirt, pants, hat, and socks. Do not use under clothing. For Chiggers and Ticks, apply to shirt and pant cuffs and socks.

NOTE: Will not damage cotton, wool, or nylon. Do not apply on or near acetate, rayon, Spandex or synthetics other than nylon, furniture, plastics, watch crystals, leather and painted or varnished surfaces (including automobiles).

After returning indoors, wash treated skin with soap and water. Wash treated clothing before reuse. Use of this product may cause skin reactions in rare cases. If you suspect that you or your child is reacting to this product, wash treated skin and call you local Poison Control Center. If you go to a doctor, take this repellent product with you.

STORAGE AND DISPOSAL

STORAGE: Store in a cool, dry place. Keep container closed.

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. Never place unused product down any indoor or outdoor drain.

Net Contents _____ Fl. Oz.

Manufactured by:

Mc LAUGHLIN GORMLEY KING COMPANY

8810 Tenth Avenue North

Minneapolis, MN 55427

EPA Reg. No. 1021-1706

EPA Est. No. 1021-MN-2