



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460-0001

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

June 10, 2008

Ms. Julie B. Schlekau, Registration Specialist  
McLaughlin Gormley King Company  
8810 Tenth Avenue North  
Minneapolis, MN 55427-4319

**Subject: Rebuttal to Amended Final Reregistration Labeling  
AQUAPEL™ 25% DEET Insect Repellent Pump Spray 27411, EPA Reg. No. 1021-1706  
Your Submission Dated March 12, 2008**

Dear Ms. Schlekau:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable with the following provision(s):

General Comment(s):

1. Delete all text throughout the label marked with "~~strikethrough~~."
2. The words "**INSECT REPELLENT**" must be displayed prominently on the front panel of this product label as well as on the alternate brand name(s), immediately after the brand name in capital lettering, with large, contrasting, bold-faced type.

Directions for Use section comment(s):

3. Replace the 3<sup>rd</sup> sentence from the 2<sup>nd</sup> paragraph with: "Avoid over-application of this product."
4. In the 15<sup>th</sup> sentence of the 2<sup>nd</sup> paragraph, delete the word "Also, ..." at the beginning of the sentence.
5. The last 3 sentences of the 2<sup>nd</sup> paragraph should be **bolded** in order to increase the prominence of these label statements.

Storage and Disposal Statement section comment(s):

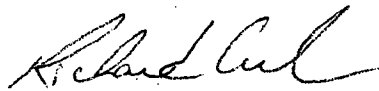
6. Revise the line labeled as "**Disposal:**" to read "**Pesticide Disposal:**"

The product must be packaged in containers utilizing a **concave trigger to help aim product** or other comparable mechanism that will ensure that the product will not be inadvertently sprayed in the eyes.

McLaughlin Gormley King Company should note that the Agency is in the process of developing and improving the current Efficacy Assessment Guidelines for repellent products. The Agency intends to defer the determination of any related efficacy data requirements supporting the claims that may appear on this label until these Efficacy Assessment Guidelines are complete. When the guidelines are finalized, the Agency expects to issue a Data Call-In to address the revised guidelines to all registrants with registrations for personal repellent products that have not previously submitted efficacy data sufficiently consistent with the revised guidelines.

A copy of your label stamped "Accepted with Comments" is enclosed for your records. Please submit two (2) copies of the final printed labeling, incorporating the above changes, before releasing the product for shipment. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product bearing amended labeling constitutes accepting of these conditions.

If you have any questions about this label review, please contact Mr. Carmen Rodia at (703) 306-0327 or via e-mail at [Rodia.Carmen@epa.gov](mailto:Rodia.Carmen@epa.gov).



Richard J. Gebken  
Product Manager (10)  
Insecticide Branch  
Registration Division (7505P)

Enclosure: Copy of label stamped "Accepted with Comments"

001021-01706 D391041

**MGK**®McLAUGHLIN  
GORMLEY  
KING COMPANY

8810 Tenth Avenue N. / Minneapolis, Minnesota 55427-4319 U.S.A. - Telephone (763) 544-0341

[ ] OR ( ) indicates alternate or optional wording

[Non-VOC Formula]

[Leaves No Sticky Residue]

[Easy To Use Pump Spray Applicator]

[With Effective DEET Repellent]

~~[From the Outdoor Exports]~~

[Repels Mosquitoes that may transmit diseases such as West Nile Virus and Encephalitis]

[Repels Mosquitoes for 8 Hours/Provides Up To 8 Hours Protection From Mosquitoes]

[Repels Biting Insects For 4 Hours / Provides Up To 4 Hours Protection]

[Repels Mosquitoes, Black Flies, Ticks, and Fleas]

ACTIVE INGREDIENT:

DEET	25.00%
OTHER INGREDIENTS	75.00%
	100.00%

AQUAPEL™ - Trademark of McLaughlin Gormley King Company

**KEEP OUT OF REACH OF CHILDREN****WARNING****FIRST AID**

<b>IF IN EYES:</b>	<ul style="list-style-type: none"> <li>Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eyes.</li> <li>Call a poison control center or doctor for treatment advice.</li> </ul>
<b>IF SWALLOWED:</b>	<ul style="list-style-type: none"> <li>Call a poison control center or doctor immediately for treatment advice.</li> <li>Have a person sip a glass of water if able to swallow.</li> <li>Do not induce vomiting unless told to do so by a poison control center or a doctor.</li> <li>Do not give anything by mouth to an unconscious person.</li> </ul>
Have the product container or label with you when calling a poison control center or doctor or going for treatment. For additional information on this pesticide product (including health concerns, medical emergencies or pesticide incidents), you may call 1-888-740-8712.	

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. **ACCEPTED**  
**with COMMENTS**  
**In EPA Letter Dated**

*June 10, 2008*  
Under the Federal Insecticide,  
Fungicide, and Rodenticide Act,  
as amended, for the pesticide  
registered under EPA Reg. No.

1021-1706**PRECAUTIONARY STATEMENTS**  
**HAZARDS TO HUMANS AND DOMESTIC ANIMALS****WARNING**

Causes substantial but temporary eye injury. Harmful if swallowed. Do not get in eyes. Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

**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. Convenient, easy to use pump spray allows quick and thorough application to skin, hair, and clothing for maximum protection.

**Read and follow all directions and precautions on this product label.** Use just enough repellent to cover exposed skin and/or clothing. ~~Heavy application and saturation is unnecessary for effectiveness.~~ If biting insects do not respond to a thin film of repellent, apply a bit more. Do not apply near eyes and mouth, apply sparingly around ears. Do not allow children to handle this product, and do not apply to children's hands. When using on children, apply to your own hands and then put it on the child. ~~Instruct older children in the proper use of this product.~~ Do not apply more than 3 times per day to children ages twelve (12) and under. Never use repellents over cuts, wounds, or irritated skin. Repellents should be applied only to exposed skin and/or clothing as directed on this product label. Do not use under clothing. After returning indoors, wash treated skin with soap and water or bathe. ~~This is particularly important when repellents are used repeatedly in a day or on consecutive days.~~ Also, wash treated clothing before wearing it again. Use of this product may cause skin reactions in rare cases. If you suspect a reaction to this product, discontinue use, wash treated skin and call your local poison control center. If you go to a doctor, take this repellent product with you.

Hold container upright about 4 - 6 inches from skin or clothing. Do not spray in enclosed areas. Avoid breathing a spray product and do not use it near food. When using sprays, do not spray directly into face; spray on hands first and then apply to face. Do not use as a space spray. Spray and spread evenly with your hand to moisten all exposed skin. Also, apply to clothing such as shirt, pants, hat and socks. Heavy application and saturation is unnecessary for effectiveness. 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 other synthetic fabrics (other than nylon), furniture, plastics (such as eyeglasses and watch crystals), leather and painted or varnished surfaces (including automobiles).

