

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

September 23, 2024

Ligia Hernandez WECHEM 5734 Sustitina Dr. Harahan, LA 70123

Subject: Label Amendment – to remove statements in precautionary statements about

avoiding contact with clothes, add "net wt." for BOV option and update other

marketing statements

Product Name: Firebug Insect Repellent Spray

EPA Registration Number: 34370-2 Application Date: December 27, 2023

Case Number: 496502

Dear Ligia Hernandez:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under FIFRA and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) lists examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or

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claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6.

If you have any questions, please contact Autumn Metzger at 202-566-2830 or Metzger.autumn@epa.gov.

Sincerely,

Beth Fertich, Product Manager 04 Invertebrate & Vertebrate Branch 1 Registration Division (7505P)

Office of Pesticide Programs

Enclosure



{Language for Front Panel of Label for Container and Peel Back Label}

{Optional Marketing Claims may be placed on front panel}

9/23/2024

Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 34370-2

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| FIRFRIIG | INICECT | REDEII | ENIT CI | DRAV |
|----------|---------|---------------|----------------|------|

ABN: BUZZ UP INSECT REPELLENT SPRAY

ABN: FIREBUG™

ABN: FIREBUG ALL-FAMILY INSECT REPELLENT SPRAY

ABN: FIREBUG INSECT REPELLENT

ABN: FIREBUG MOSQUITO & TICK REPELLENT ABN: FIREBUG TICK AND INSECT REPELLENT

ABN: EXTREME INSECT REPELLENT

[Insect Repellent Spray] [All-Family Insect Repellent Spray] [Tick and Insect Repellent] [Mosquito & Tick Repellent]

{if applicable} Continuous Spray / BOV / Bag-On-Valve technology / Pump Spray / Pump / Liquid

ACTIVE INGREDIENTS:

| | TOTAL 100.0% |
|---|--------------|
| OTHER INGREDIENTS: | <u>80%</u> |
| Picaridin, 1-Methylpropyl-2-(2-hydroxyethyl)-1-piperidine carboxylate | 20% |
| | |

KEEP OUT OF REACH OF CHILDREN.

CAUTION: Stop and read this entire label before use.

{Note: "Stop and read this entire label before use." May be placed after Caution or directly before Directions for Use.}

See back [side] panel [card] [behind peel back] for additional precautionary statements.

IN CASE OF EMERGENCY, CALL: 1-800-535-5053

{Pump} Net Contents: [_] fluid oz /fl. oz. [_] ml

{BOV} Net Weight: [] oz. [] g

{Language for Back Panel of Label for Container, Card and Peel Back Label}



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PRECAUTIONARY STATEMENTS

CAUTION. Hazards to Humans: Causes moderate eye irritation. Avoid contact with eyes. Wash hands thoroughly with soap and water after handling, returning indoors, and before eating, drinking, chewing gum, using tobacco, or using the toilet.

PHYSICAL HAZARDS

{Pump containers}

FLAMMABLE. Do not use or store near heat sources, sparks or open flame. Do not smoke while applying.

{BOV containers}

FLAMMABLE. Do not use or store near heat sources, sparks or open flame. Do not smoke while applying. Contents under pressure do not puncture or incinerate container. Exposure to temperature above 130°F may cause bursting.

{Note: First Aid grid format used if market label space permits: otherwise a paragraph format will be used}

| FIRST AID | | |
|------------------|---|--|
| IF IN EYES: | Hold eye open and rinse gently with water for 15-20 minutes. | |
| | Remove contact lenses, if present, after the first fire (5) minutes, then continue rinsing. | |
| | Call a poison control center or doctor for treatment advice. | |
| IF | Call a physician or Poison Control Center immediately for treatment advice. | |
| SWALLOWED: | Have person sip a glass of water if able to swallow | |
| | Do not induce vomiting unless told to do so by a Poison Control Center or a doctor. | |
| | Do not give anything to an unconscious person. | |
| If you suspect a | reaction to this product, discontinue use, wash treated skin and call your Poison | |
| Control Center. | Have the product container or label with you when calling a Poison Control Center or | |

If you suspect a reaction to this product, discontinue use, wash treated skin and call your Poison Control Center. Have the product container or label with you when calling a Poison Control Center or doctor or going for treatment. You may also contact 1-800-535-5053 for emergency medical information.



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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 {or} all labels and packaging.

[Remove protective cap.] Hold [can] 4 to 6 inches from skin while spraying, keeping nozzle pointed away from face. Slightly moisten skin or clothing with a slow sweeping motion. Use just enough repellent to cover exposed skin and/or clothing. Do not use under clothing. Do not spray directly on face or enclosed areas. [Do not inhale.] Do not apply near eyes and mouth. Spray on hands first, and then apply sparingly to face, neck and around ears, avoiding your eyes. Do not apply over cuts, wounds, or irritated skin, and do not apply to excessively sunburned skin. Do not apply to children's hands. Do not allow children to handle this product. When using on children, apply to your own hands and then put it on the child. Excessive amounts or frequent reapplication is unnecessary. Avoid over-application of this product. Do not exceed more than 2 applications per day. Apply sparingly around ears. After returning indoors, wash treated skin with soap and water [and double-check yourself and other family members for ticks.] Wash treated clothing before wearing it again. Use of this product may cause skin reactions in rare cases.

{Directions for use, when claims of flame-resistant clothing/FRC are present} FOR USE ON: [FR] [Flame Resistant] [FRC] [clothing]: Allow product to dry for 30 minutes before being exposed to areas of energized equipment.

{Note: Storage & Disposal grid format used if market label space permits: otherwise, a paragraph format will be used}

STORAGE & DISPOSAL

Pesticide Storage: Store this product in a cool, dry (preferably locked) place, out of reach of children. Keep away from heat, sparks, and open flame.

Pesticide Disposal and Container Handling: Non-refillable container. Do not reuse or refill this container. Do not puncture or incinerate! **If Empty:** 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.

| WARRANTY DISCLAIMER : To the extent consistent with applicable law, buyer assumes all responsibility for safety and use not in accordance with directions. | | | |
|---|-----------------------|-----------------|--|
| EPA Reg. No.: | EPA Est. No.: | [Batch Lot No.: | |
| Wechem, Inc. {5734 Susitna Di | r.] Harahan, LA 70123 | | |



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{For Very Small Packaging: When container size does not allow a peel back label, product will <u>always be sold attached to a card with the complete "back panel" labeling</u> from above, and these very small sizes will have the following language on the immediate container}

FIREBUG INSECT REPELLENT SPRAY

| ACTIVE INGREDIENTS. | |
|---|--------------|
| Picaridin, 1-Methylpropyl-2-(2-hydroxyethyl)-1-piperidine carboxylate | 20% |
| OTHER INGREDIENTS: | 80% |
| | TOTAL 100.0% |

KEEP OUT OF REACH OF CHILDREN.

CAUTION: Stop and read this entire label before use.

{Note: "Stop and read this entire label before use." May be placed after Caution or directly before Directions for Use.}

See back [side] panel [card] [behind peel back] for additional precautionary statements.

IN CASE OF EMERGENCY, CALL: 1-800-535-5053

{Pump} Net Contents: [] fluid oz /fl. oz. [] ml

{BOV} Net Weight: [] oz. [] g

PRECAUTIONARY STATEMENTS

CAUTION: Hazards to Humans: Causes moderate eye irritation. Avoid contact with eyes. Wash hands thoroughly with soap and water after handling, returning indoors, and before eating, drinking, chewing gum, using tobacco, or using the toilet.

PHYSICAL HAZARDS

ACTIVE INCREDIENTS:

{Pump containers}

FLAMMABLE. Do not use or store near heat sources, sparks or open flame. Do not smoke while applying. {BOV containers:}

FLAMMABLE. Do not use or store near heat sources, sparks or open flame. Do not smoke while applying. Contents under pressure do not puncture or incinerate container. Exposure to temperature above 130°F may cause bursting.

{Note: First Aid grid format used if market label space permits: otherwise a paragraph format will be used}



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| FIRST AID | | |
|---|---|--|
| IF IN EYES: | Hold eye open and rinse gently with water for 15-20 minutes. Remove contact lenses, if present, after the first fire (5) minutes, then continue rinsing. | |
| | Call a poison control center or doctor for treatment advice. | |
| IF SWALLOWED: | Call a physician or Poison Control Center immediately for treatment advice. Have person sip a glass of water if able to swallow | |
| | Do not induce vomiting unless told to do so by a Poison Control Center or a doctor. Do not give anything to an unconscious person. | |
| If you suspect a reaction to this product, discontinue use, wash treated skin and call your Poison Control Center. Have the product container or label with you when calling a Poison Control Center or | | |

doctor or going for treatment. You may also contact 1-800-535-5053 for emergency medical

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 all labels and all packaging. [Remove protective cap.] [{Spray delivery} Hold 4 inches from skin while spraying keeping nozzle pointed away from face and slightly moisten area with a slow sweeping motion. Do not spray directly on face, spray on hands first and then rub on face. Apply sparingly around ears. Do not apply to the hands of small children. Avoid contact with eyes, mouth, cuts, wounds, or irritated skin. Do not

{Note: Storage & Disposal grid format used if market label space permits: otherwise, a paragraph format will be used}

STORAGE & DISPOSAL

information.

Pesticide Storage: Store this product in a cool, dry (preferably locked) place, out of reach of children. Keep away from heat, sparks, and open flame.

Pesticide Disposal and Container Handling: Non-refillable container. Do not reuse or refill this container. Do not puncture or incinerate! **If Empty:** 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.

WARRANTY DISCLAIMER: To the extent consistent with applicable law, buyer assumes all responsibility for safety and use not in accordance with directions.

| Wechem, Inc., Harahai | n, LA 70123 | | |
|-------------------------|---------------|-----------------|--|
| [Questions?] Call 504-7 | 733-1152 | | |
| EPA Reg. No.: | EPA Est. No.: | [Batch Lot No.: | |
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apply to excessively sunburned skin. Do not apply under clothing.



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Optional Statements

The following are optional selling/marketing statements.

Statements may be placed on the front, back, side panels of labels. Including cards, peel back labels and optional marketing literature.

- 1. Repels Mosquitoes that may transmit/ carry West Nile Virus / Zika Virus / Dengue Fever for up to 12 hours of protection
- 2. Repels Mosquitoes that may transmit/ carry West Nile Virus / Zika Virus/ Dengue Fever for up to 12 hours
- 3. Repels Mosquitoes that may transmit/ carry West Nile Virus / Zika Virus/ Dengue Fever
- 4. Repels Mosquitoes that may transmit/ carry West Nile Virus, Zika Virus, or Dengue Fever for up to 12 hours of protection
- 5. And/& Repels Ticks that may carry Lyme Disease for up to 12 hours of protection
- 6. And/& Repels Ticks that may carry Lyme Disease
- 7. Repels Ticks that may carry Lyme Disease for up to 12 hours of protection
- 8. Repels mosquitoes / ticks / mosquitoes and ticks for up to 12 hours, and biting flies, stable flies, black flies, gnats, chiggers, sand flies, and Scottish biting midges for up to 8 hours.
- 9. REPELS Biting flies / stable flies / black flies / gnats / chiggers; [&] sand flies and Scottish biting midges for up to 8 hours
- 10. REPELS Biting flies, stable flies, black flies, gnats, chiggers, [&] sand flies and Scottish biting midges for up to 8 hours.
- 11. REPELS Biting flies / stable flies / black flies / gnats / chiggers / sand flies and Scottish biting midges
- 12. Long-lasting Effective 12-hour Mosquito & Tick Protection
- 13. Long-lasting Effective 12-hour Mosquito / Tick Protection
- 14. Long-lasting 12-hour effective protection from mosquitoes and ticks
- 15. Long-lasting 12-hour effective protection from mosquitoes / ticks
- 16. Long-lasting, 12-hour effective protection from ticks, including ticks carrying Lyme Disease
- 17. 12-Hour protection from Mosquitoes and Ticks.
- 18. Protection from Mosquitoes / Ticks
- 19. Protects against Mosquitoes / Ticks
- 20. Long Lasting 12-Hour Protection from Mosquitoes and Ticks
- 21. Long Lasting 12-Hour Protection from Mosquitoes / Ticks
- 22. Long-lasting, 12-hour effective protection from ticks, including ticks carrying Lyme Disease
- 23. Protects against ticks and mosquitoes for up to 12 hours, and biting flies, stable flies, black flies, gnats, chiggers, and sand flies for up to 8 hours
- 24. Protects against ticks / mosquitoes for up to 12 hours, and biting flies / stable flies / black flies / gnats / chiggers and sand flies for up to 8 hours



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- 25. Protects / Repels against ticks / mosquitoes / biting flies / stable flies / black flies / gnats / chiggers / sand flies Scottish biting midges
- 26. For up to 12 hours of protection against mosquitoes and ticks, and up to 8 hours of protection against biting flies, stable flies, black flies, gnats, chiggers, sand flies and Scottish biting midges.
- 27. For up to 12 hours of protection against mosquitoes / ticks, and up to 8 hours of protection against biting flies / stable flies / black flies / gnats / chiggers / sand flies / Scottish biting midges.
- 28. including mosquitoes that may be carrying and/& that may transmit West Nile Virus.
- 29. including mosquitoes that may be carrying and/& that may transmit Zika Virus.
- 30. including mosquitoes that may be carrying and/& that may transmit Dengue Fever
- 31. including mosquitoes that may be carrying and/& that may transmit Chikungunya
- 32. including mosquitoes that may be carrying and/& that may transmit West Nile Virus, Zika, or Dengue Fever
- 33. including mosquitoes that may be carrying and/& that may transmit West Nile Virus / Chikungunya / Dengue Fever / and Zika
- 34. Repels and protects against Mosquitoes that may carry / transmit Zika Virus / West Nile Virus / Dengue Fever / Chikungunya and Ticks that may carry Lyme Disease for up to 12 hours.
- 35. Repels and protects against Mosquitoes that may carry / transmit Zika Virus / West Nile Virus / Dengue Fever / Chikungunya and Ticks that may carry Lyme Disease
- 36. including mosquitoes that may be carrying and/& that may transmit Chikungunya, Dengue, and Zika
- 37. Long-lasting, 12- hour effective protection from ticks, including ticks carrying Lyme Disease
- 38. Repels and protects against Mosquitoes that may transmit Zika Virus, West Nile Virus, Dengue Fever, Chikungunya and Ticks that may carry Lyme Disease for up to 12 hours.
- 39. Contains Picaridin
- 40. Aerosol-like Spray
- 41. Continuous Spray
- 42. Pump Spray
- 43. No Rubbing required
- 44. One Touch Pump
- 45. Easy Application
- 46. No Mess
- 47. Convenient, no mess, no rub protection
- 48. Spray Upside Down
- 49. Level {for packages with clear indicator of amount remaining}
- 50. Running Low {for packages with clear indicator of amount remaining}
- 51. Twist Close Cap
- 52. Airplane carry-on size
- 53. TSA {approved] travel size
- 54. TSA [approved] carry-on size
- 55. Convenient Travel Size



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- 56. Convenient Airplane Travel Size
- 57. Airplane carry-on
- 58. Carry on size
- 59. Use with confidence on the whole family
- 60. And your family will want to use it, too
- 61. Not oily, greasy or sticky
- 62. Cool Spray
- 63. Spray (and) ('n) go
- 64. Non-oily
- 65. Does not damage plastic
- 66. Won't Damage Fishing Lines, Plastics or other Synthetic Materials [Fisherman's Formula]
- 67. Won't Damage Fishing Lines, Plastics or other Synthetic Materials [Gear Safe]
- 68. Unscented [Repels bug(s), not people]
- 69. Pocket Size
- 70. Non-Staining
- 71. Quick Drying
- 72. Dye-Free
- 73. Not your standard aerosol:
 - a. Apply upside down without worry
 - b. Product delivery is the same regardless of the position the can is held during spraying
 - c. May be sprayed upright, inverted, or at any angle
 - d. Constant pressure of application won't lose pressure as can empties
 - e. Same product delivery from the initial spray to the last spray
 - f. Continuous Spray [Insect Repellent] [Mosquito Repellent]
 - g. Quick and Even Coverage
 - h. No Rub, No Hassle
 - i. No chilling effect compared to a standard aerosol
 - j. No pumping motion needed
- 74. Pleasant Fragrance /Scent.
- 75. Unscented
- 76. Feels light and clean
- 77. No one will know you're wearing it
- 78. You won't smell it
- 79. You'll forget you're wearing it
- 80. Won't damage [fishing line, gun barrel, plastic lenses] [sporting equipment] [camping equipment]
- 81. Clean, dry feel
- 82. Light, Clean
- 83. Passes ASTM F2621-12 Standard Practice Method (Electric Arc Test)



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- 84. Passes IEC 61482-1-1: 2009 Live Working Method (Electric Arc Test)
- 85. Insect repellent to be used on general clothing, [FR] [Flame Resistant] [FRC] clothing.
- 86. Will not affect the protection properties of FR (Flame Resistant) clothing (After 30 minute drying time).
- 87. For Clothing & Gear
- 88. For use on general clothing, [FR] [Flame Resistant] [FRC] clothing, and skin
- 89. For use by any worker exposed to insects around electric and power utilities.
- 90. Spray on: shirts, pants, socks, hats, boots and shoes.
- 91. Will not damage fabrics and plastics.
- 92. Will not adversely affect [Rubber Lineman's gloves] [Rubber Goods]
- 93. Passes ASTM D120 AC Electrical Proof Test
- 94. Performed ASTM D6413 (Vertical Flame Test) with 0 [Zero] Afterflame
- 95. Outdoor / Worker / Workman's / Utility Worker / Utility Worker's formula.
- 96. Sportman / Sportman's / Outdoor formula.
- 97. Outdoor 12-Hour protection from Mosquitoes / Ticks.

{OPTIONAL GRAPHICS}

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smile face