

74843-2

1/28/2009

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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Dr. Elizabeth Anne Brown
Technical and Regulatory Analyst
Buzz Off Insect Shield LLC
P.O. Box 10129
Greensboro, NC 27404

JAN 28 2009

RE: Notification of Alternate Brand Name: Bug Shield Repellent Apparel
EPA Registration Number: 74843-2
Date of Submission: November 4, 2008

Dear Dr. Brown:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated November 4, 2008, for the product Buzz Off Insect Shield Insect Repellent Apparel. 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 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,

Rachel A. Harriman
for

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

Please read instructions on reverse before completing form

Form Approved, OMB No. 2070-0060, Approval expires 5-31-98



United States
Environmental Protection Agency
Washington, DC 20460

<input type="checkbox"/>	Registration
<input type="checkbox"/>	Amendment
<input checked="" type="checkbox"/>	Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 74843-2	2. EPA Product Manager George LaRocca	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Buzz Off Insect Shield Insect Repellent Apparel	PM # 13	
5. Name and Address of Applicant (Include ZIP Code) Buzz Off Insect Shield, LLC P.O. Box 10129 Greensboro, NC 27404 <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	NOTIFICATION JAN 28 2009

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 of Labeling Change (Alternate Brand Name) per PR Notice 98-10, Section II A

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 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 98-10 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:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal - epoxy lined	
*Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 1 garment		5. Location of label directions <input type="checkbox"/> On Label <input checked="" type="checkbox"/> On Label accompanying product	
6. Manner in Which Label is Affixed to Product				<input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled <input checked="" type="checkbox"/> Other stenciled or sewn in inner label plus attached hangtag outer label	

Section IV

1. Contact Person (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Elizabeth Anne Brown	Title Step toe & Johnson, LLP Authorized agent	Telephone No. (Include Area Code) 202-419-5166
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 (Stamped)
2. Signature <i>Elizabeth Anne Brown</i>	3. Title Step toe & Johnson, LLP Authorized agent	
4. Typed Name Elizabeth Anne Brown	5. Date November 4, 2008	

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STEPTOE & JOHNSON LLP

ATTORNEYS AT LAW

WRITER'S DIRECT DIAL
202.419.5166

1330 Connecticut Avenue, NW
Washington, DC 20036-1795
Tel 202.429.3000
Fax 202.429.3902
steptoe.com

November 4, 2008

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

Attention: George LaRocca (PM 13)

Subject: BUZZ OFF Insect Shield Insect Repellent Apparel, EPA Reg. No. 74843-2
Notification of Alternate Brand Name per PR 98-10

Dear George:

On behalf of our client, Buzz Off Insect Shield, LLC, enclosed please find a notification for Buzz Off Insect Shield Insect Repellent Apparel (EPA Reg. No. 74843-2) to add an alternate brand name. Enclosed with this application, please find EPA Form 8750-1 and a copy of the label with changes highlighted. This notification is consistent with PR 98-10.

Sincerely,

Elizabeth Anne Brown

Elizabeth Anne Brown, Ph.D.
Technical and Regulatory Analyst
eabrown@steptoe.com

cc: Buzz Off Insect Shield, LLC

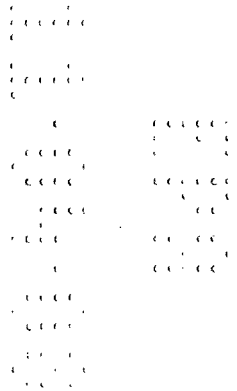
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**Bug Shield
Repellent
Apparel**
Do Not Dry Clean
Repels mosquitoes,
ticks, ants,
flies, chiggers
and midges.
Repellency
remains effective
for 70 washings
-[fold line]-
Active Ingredient:
Permethrin
0.52% w/w
EPA Reg No.
74843-2
EPA Est No.
74843-xx-xxx
Dispose of garment
in trash. Wash
separately from other
clothing. Refer to
hang tag for more
information

[EPA Accepted
6-27-2007

11-4-2008 Notification

NOTE: This is the actual size of the label.]



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Hang-tag on outside of garment (removable by consumer)

BUG SHIELD REPELLENT APPAREL from [clothing brand]

- THIS GARMENT HAS BEEN TREATED WITH **BUG SHIELD** PERMETHRIN INSECT REPELLENT
- REPELS MOSQUITOES, TICKS, ANTS, FLIES, CHIGGERS, AND MIDGES
- DRYCLEANING REMOVES ACTIVE INGREDIENT- DO NOT DRYCLEAN
- REPELLENCY REMAINS EFFECTIVE FOR 70 WASHINGS
- DO NOT RE-TREAT GARMENT WITH OTHER PERMETHRIN INSECT REPELLENT PRODUCTS
- FOR PROTECTION OF EXPOSED SKIN, USE IN CONJUNCTION WITH AN INSECT REPELLENT REGISTERED FOR DIRECT APPLICATION TO SKIN.
- WASH TREATED GARMENTS SEPARATELY FROM OTHER CLOTHING.

EPA Reg No. 74843-2
 EPA Establishment No. 74843-xx-XXX

Active Ingredient		
Permethrin		0.52%
Other Ingredients (Garment)		<u>99.48%</u>
		100.00%

NOTIFICATION
JAN 28 2009

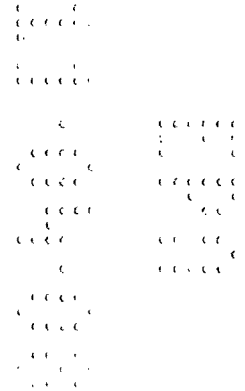
Manufactured by Buzz Off Insect Shield, LLC.
 P.O. Box 10129
 Greensboro, NC 27404

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

Storage and Disposal
 Do not contaminate water, food or feed by storage or disposal.
 Disposal: Discard in trash when clothing is worn out. Do not reuse clothing for other purposes than as a garment.

RETAIN THIS TAG FOR FUTURE REFERENCE ON PROPER HANDLING OF THIS GARMENT. THIS TAG NOT TO BE REMOVED EXCEPT BY CONSUMER.

[EPA-ACCEPTED. 6-27-2007]



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Optional Marketing Statements for hang-tag/outer label

- Repels mosquitoes (including those which may carry West Nile Virus)
- Repels ticks (including those which may carry Lyme disease)
- In heavily infested areas, you may prefer to wear long-sleeved shirts and pants to increase protection
- Neither Bug Shield Repellent Apparel nor any other insect protection product can guarantee complete protection from insects or insect bites
- Does not protect against diseases or reactions from insect bites
- Bug repellent
- No bugs, no bite
- Whether in the backwoods or the backyard, Bug Shield Repellent Apparel helps keep you protected
- Buzz Off Insect Shield is a patent-pending technology for treating apparel that repels mosquitoes, ticks, ants, flies, chiggers and midges
- By taking advantage of the latest fibers and technology, we've created a comfortable microclimate for your feet that also repels insects
- All Buzz, No Bite
- Buzz Off and Get Out [Outside]
- Enjoy the Outdoors
- Bug Shield [Repellent Apparel] has you covered
- You can't tell it's there but the bugs can
- Built-In Insect Protection
- Invisible
- Invisible Protection
- Invisible protection just by putting on your clothes
- Durable. Lasts through 70 washes, the expected lifetime of a garment
- Lasts through 70 washes
- Convenient
- Comfortable
- Effective
- Easy care. Normal home laundering is recommended
- [Used as a heading:] Bug Shield Repellent Apparel Advantages

