

74843-2

4/8/2010

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

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

APR 8 2010

Ms. Juli Mann  
Insect Shield, LLC  
P.O. Box 10129  
Greensboro, NC 10129

Subject: Application for Pesticide Notification (PRN 98-10)

Dear Ms. Mann:

The Agency is in receipt of your Application(s) for Pesticide Notification under Pesticide Registration Notice PRN 98-10 dated March 22, 2010 for the following product(s):

- Buzz Off Insect Shield Insect Repellent Apparel (EPA Reg. No. 74843-2)**
- Buzz Off Insect Shield Concentrate 14D (EPA Reg. No. 74843-3)**
- Buzz Off Insect Shield Concentrate 15 D (EPA Reg. No. 74843-4)**
- Eastern Insect Repellent Gear (EPA Reg. No. 74843-5)**

The Registration Division (RD) has conducted a review of this request for applicability under PRN 98-10 and finds that the label change(s) requested falls within the scope of PRN 98-10. The label has been date-stamped "Notification" and will be placed in our records.

Please be reminded that 40 CFR Part 156.140(a)(4) requires that a batch code, lot number, or other code identifying the batch of the pesticide distributed and sold be placed on nonrefillable containers. The code may appear either on the label (and can be added by non-notification/PR Notice 98-10) or durably marked on the container itself.

If you have any questions, please contact Regina Foushee'-Smith at 703-605-0780.

Sincerely,

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

2016

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 Mark Suarez	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Insect Shield Insect Repellent Apparel (new primary brand name)	PM # 13	
5. Name and Address of Applicant (Include ZIP Code) 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: <b>NOTIFICATION</b> EPA Reg No. Product Name <b>APR - 8 2010</b>	

**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 Changes per PR Notice 98-10 (Change in Primary Brand Name and Alternate Brand Name (Section IIA)). Change in primary brand name to **Insect Shield Insect Repellent Apparel** and retention of the former primary brand name, **Buzz Off Insect Shield Insect Repellent Apparel**, as an alternate brand name.

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	No. per container	<input type="checkbox"/> Metal - epoxy lined	<input checked="" type="checkbox"/> Other (Specify) <u>none</u>
*Certification must be submitted		If "Yes" Unit Packaging wgt.		If "Yes" Package wgt.	
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 <u>stenciled or sewn in inner label plus attached hangtag outer label</u>	

**Section IV**

1. Contact Person (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Juli Mann	Title Step toe & Johnson, LLP Authorized agent	Telephone No. (Include Area Code) 202-429-3095			
<b>Certification</b> 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  <b>(Stamped)</b>
2. Signature 	3. Title Step toe & Johnson, LLP Authorized agent				Date March 22, 2010
4. Typed Name Juli Mann					

STEPTOE & JOHNSON<sup>LLP</sup>

ATTORNEYS AT LAW

3096

WRITER'S DIRECT DIAL  
202.429.3095

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

March 22, 2010

*Via Hand Delivery*

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: Mark Suarez (PM 13)

Subject: Notification per PR N 98-10: Change in Primary Brand Name and of Addition of Alternate Brand Name  
Product: BUZZ OFF Insect Shield Insect Repellent Apparel (EPA Reg. No. 74843-2)

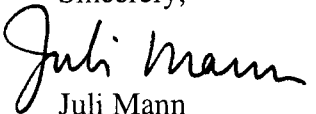
Dear Mr. Suarez:

On behalf of our client, Insect Shield, LLC, enclosed please find a notification for Buzz Off Insect Shield Insect Repellent Apparel (EPA Reg. No. 74843-2) to change the primary brand name to **Insect Shield Insect Repellent Apparel** and retain the current primary brand name, **Buzz Off Insect Shield Insect Repellent Apparel**, as an alternate brand name.

Enclosed with this application, please find EPA Form 8750-1 and one copy of the label indicating the change in primary brand name and a second label identifying the alternate brand name. This notification is consistent with PR N 98-10.

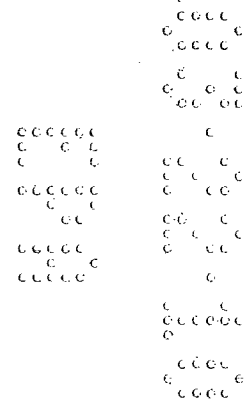
Please contact me if there are any questions.

Sincerely,



Juli Mann  
Paralegal Specialist

ecc: Insect Shield, LLC



**NOTIFICATION**

**APR - 8 2010**

4096

New Primary Brand Name Label  
Notification for change in primary brand name and ABN  
3/22/10

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

**INSECT SHIELD INSECT REPELLENT APPAREL** from [clothing brand]

- THIS GARMENT HAS BEEN TREATED WITH **INSECT SHIELD PERMETHRIN INSECT REPELLENT**
- REPELS MOSQUITOES, TICKS, ANTS, FLIES, CHIGGERS, AND MIDGES
- DRYCLEANING REMOVES ACTIVE INGREDIENT- DO NOT DRY CLEAN
- 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%

Manufactured by 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.**

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 Insect Shield 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, Insect Shield helps keep you protected
- 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
- Insect Shield 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:] Insect Shield Advantages

**Insect Shield**  
**Insect**  
**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

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

[New primary brand name label (apparel inner label); Notification for change in primary brand name and ABN; 3/22/10]