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

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

March 30, 2010

Ms. Jean Killoren, Authorized Agent for Wisconsin Pharmacal Company, LLC c/o Killoren Regulatory Consulting 316 Highland Avenue Hartford, WI 53027-1318

Subject:

Amended Labeling, Response to SAL Dated November 18, 2009 EVERGLADES 100 INSECT REPELLENT, EPA Reg. No. 79533-2 Your Submission Dated January 19, 2010

Dear Ms. Killoren:

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

General Comment(s):

Delete all text throughout the label marked with "strikethrough."

Optional Marketing Claims section comment(s):

- 2. Within optional marketing claim #1, replace the words "Keeps off" with the word "Repels."
- 3. Delete optional marketing claim #6, since DEET in itself does have a scent. Alternatively, optional marketing claim #6 can be revised to read "Low Odor Formula," similar to the comparison product.
- 4. Revise optional marketing claim #17 to read "Up to 10 hours of protection."

First Aid Statement section comment(s):

5. Insert the following text as a 2nd sentence within the **HOT LINE NUMBER** subsection: "For additional information on this product (including health concerns, medical emergencies or pesticide incidents), you may call 1-800-xxx-xxx." ¹

Precautionary Statements, Hazards to Humans subsection comment(s):

6. Within the existing 6th sentence, insert the word "thoroughly" immediately preceding the word "before."

Directions for Use section comment(s):

- 7. Relocate the line of text that reads "READ AND FOLLOW ALL DIRECTIONS AND PRECAUTIONS ON THIS PRODUCT LABEL" to appear immediately following the statement "It is a violation of Federal law ..."
- 8. Revise the statement "General Precautions and Restrictions" to read "Use Restrictions and Precautions."
- 9. Revise the 2nd sentence of the 1st paragraph to read "If used on the face, spray on hands first and then apply sparingly and avoid eyes. Do not spray directly onto face."

¹ Please note that the "1-800-xxx-xxxx" telephone number listed must be available twenty-four (24) hours per day, seven (7) days per week for answering and responding to any medical emergencies or health concerns.

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Directions for Use section comment(s), continued:

- 10. Within the 3rd sentence of the 1st paragraph, replace the words "Never use repellent" with the words "Do not apply."
- 11. Revise the 7th sentence of the 1st paragraph to read "Avoid over-application of this product. If biting insects do not respond to a thin film of repellent, apply a bit more."
- 12. Revise the 13th, 14th and 15th sentences of the 1st paragraph to read "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."

Storage and Disposal section comment(s):

- 13. Replace the existing "PESTICIDE STORAGE:" subsection with "PESTICIDE STORAGE: Keep this product in its tightly closed original container, when not in use. Store in a cool, dry (preferably locked) area that is inaccessible to children and animals."
- 14. Replace the existing "CONTAINER DISPOSAL:" subsection with "CONTAINER DISPOSAL: If empty: Do not reuse this container. 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."

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 section 6(e) of FIFRA. 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*.

Sincerely yours,

Richard J. Gebken Product Manager (10)

Insecticide Branch

Registration Division (7504P)

Enclosure: Label stamped "Accepted with Comments"

January 2010

EVERGLADES 100 INSECT REPELLENT

Alternate Name: Coleman 100 Max Insect Repelient Coleman Max 100 Insect Repelient

- [Pump Spray
- Liquid
- Keeps off Mosquitoes, Chiggers, Biting Flies, Gnats, Ticks
- Designed for active people
- Perfect for hunters, and out door sportsmen
- Unseented
- · Also repels ticks, biting flies, gnats & chiggers
- Convenient Go Ready Spray Pen
- Clips anywhere No cap to remove or lose
- Twist-Lock TopTM Prevents Accidental Spray
- If you're going to go... Go ReadyTM
- 190+ Sprays
- Personal Pocket size
- Travel Size
- For Severe Conditions
- Protects for up to 10 hours
- 10 hours of protection]

ACCEPTED
With COMMENTS
In EPA Letter Dated:
March 30, 2010

Under the Federal Insecticide, Fungicide and Rodenticide Act, As amended, for the pesticide Registered under EPA Reg. No:

79533-2

ACTIVE INGREDIENT:

DEET

98.11 %

OTHER INGREDIENTS:

1.89 %

Total

100.00 %

KEEP OUT OF REACH OF CHILDREN

WARNING:

See Precautionary Statements on Back

Back/Inside Panel

FIRST AID	
IF IN EYES:	 Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first five minutes, then continue rinsing eyes.
	Call a poison control center or doctor for treatment advice.
IF SWALLOWED:	 Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to by a poison control center or a doctor. Do not give anything by mouth to an unconscious person.

HOT LINE NUMBER:

In case of emergency call the International Poison Center at 888-749-8712 [or toll free <Insert Number>]: Have the product container or label with you when calling a poison control center or doctor or going for treatment.

NOTE TO PHYSICIAN:

Probable mucosal damage may contraindicate the use of gastric lavage.

NET CONTENTS:

fl. oz. (mL)



PRECAUTIONARY STATEMENTS

Hazards to Humans

WARNING: Causes substantial but temporary eye injury. Harmful if swallowed. Do no get in eyes. Use of this product may cause skin reactions in rare cases. Wash treated clothing before wearing it again. Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.

READ AND FOLLOW ALL DIRECTIONS AND PRECAUTIONS ON THIS PRODUCT LABEL

DIRECTIONS FOR USE:

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

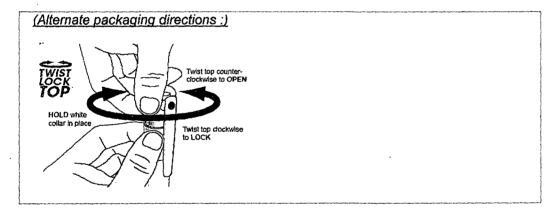
To repel insects, apply to exposed skin areas.

General Precautions and Restrictions

Do not apply near eyes and mouth, and apply sparingly around ears. When using sprays, do not spray directly into face; spray on hands first and then apply to face. Never use repellent over cuts, wounds or irritated skin. 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. 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 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. Do not spray in enclosed areas.

If you suspect a reaction to this product, discontinue use and take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

[To avoid damage, do not apply to acetate, rayon, spandex, furniture finishes, leather, plastics, painted or varnished surfaces, watch crystals, guns, bows, automobiles. [Allow repellent to dry before handling bow or gunstock.]]



STORAGE AND DISPOSAL:

PESTICIDE STORAGE:

Store the product in a cool and dry place. Keep out of reach of children.

CONTAINER DISPOSAL:

Store the product in a cool and dry place. Keep out of reach of children.

IF EMPTY: Nonrefillable container. Do not reuse or refill this container. 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.

Wisconsin Pharmacal Company, LLC Jackson, WI 53037 Questions or Comments? Call 1-800-558-6614 [www.pharmacalway.com] Made in USA

EPA Reg. No.: 79533-2 EPA Est. No.: 79533-WI-1