



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

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

July 1, 2009

Ms. Vee Lee,  
Regulatory Affairs Specialist  
WPC Brands, Inc.  
P.O. Box 4406  
Bridgeton, MO 63044-0406

**Subject: Revised DEET Label, Response to EPA Letter Dated November 12, 2008  
Repel Insect Repellent Towelette, EPA Reg. No. 305-29  
Your Submission Dated March 19, 2009**

Dear Ms. Lee:

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 label revision provision(s):

Net Contents/Net Weight Statement section comment(s):

- 1. The net contents must be expressed in terms of liquid measure (fluid ounces) per individual wipe and also total fluid ounces per package. <sup>1</sup>

Directions for Use section comment(s): To facilitate inclusion of language from the RED for DEET:

- 2. In the 1<sup>st</sup> paragraph of this section, replace the 2<sup>nd</sup> sentence with: "Wipe on a thin, uniform film over all exposed skin. Do not apply near eyes and mouth."
- 3. In the 1<sup>st</sup> paragraph of this section, replace the 6<sup>th</sup> sentence with: "Avoid over-application of this product."

Precautionary Statements, Hazard to Humans and Domestic Animals section comment(s):

- 4. Insert the following text immediately following the 4<sup>th</sup> sentence: "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."

First Aid Statement comment(s):

- 5. Delete the existing statement (3<sup>rd</sup> row of this table) starting with "**IF YOU SUSPECT A REACTION TO THIS PRODUCT:**" since this text has already been replaced/updated with revised text that was added to the Precautionary Statements section.

<sup>1</sup> For more detailed information, please refer to Chapter 17, Section III(A)(2) of EPA's Label Review Manual.

Current labels on DEET repellent products tend to dissolve from contact with the repellent (usually liquids). All reregistered DEET product labels must use materials that remain permanent and readable for the reasonable life of the product.

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.

Should you wish to add/retain a reference to the company's website on your label, 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 be 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 claims substantially differing from the EPA-approved registration, the website will be referred to EPA's Office of Enforcement and Compliance Assurance (OECA). As an alternative, you may refer consumers to the company's phone number or e-mail address.

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 J. Rodia, Jr. at (703) 306-0327 or via e-mail at [Rodia.Carmen@epa.gov](mailto:Rodia.Carmen@epa.gov).

Sincerely Yours,

*FOR*  


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

Enclosure: Label stamped "Accepted with Comments"  
000305-00029 D416459

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### Master Label

*Base Name:*

**Repel Insect Repellent Towelette**

**INSECT REPELLENT** (either in name or stated separately)

Keep Out of Reach of Children

CAUTION: See back panel for precautions.

**ACTIVE INGREDIENTS:**

DEET 55.0 %

**OTHER INGREDIENTS:** 45.0 %

**TOTAL** 100.0 %

Contains 18 Towelettes, Total Net Weight 3 oz (85 g)

Back labeling

**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.**

Individual packages: Tear open envelope and unfold towelette.

Multiple packages: Open package and remove single towelette, Seal tightly after removal.

Unfold towelette. Wipe on a thin uniform film over all exposed skin except eye and mouth. Apply sparingly around ears. Use just enough repellent to cover exposed skin and/or clothing. Do not use under clothing. Avoid over-application. Do not apply over cuts, wounds or irritated skin. Do not allow children to handle this product. When using on children, apply to your own hands and then put it on the child. Do not apply to children's hands.

❖ For use on outer surfaces of clothing: wipe shirts, pants, and hats. For ticks, chiggers and fleas apply to tops of socks and around opening in outer clothing.

After returning indoors, wash treated skin with soap and water. Wash treated clothing before wearing it again.

**STORAGE AND DISPOSAL: PESTICIDE STORAGE:**

Store this product in a cool, dry place that is inaccessible to children. **CONTAINER DISPOSAL: If empty:** Nonrefillable container. Do not reuse or refill 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.

**PRECAUTIONARY STATEMENTS:**

**HAZARD TO HUMANS AND DOMESTIC ANIMALS -**

**CAUTION:** Causes moderate eye irritation. Avoid contact with eyes. Harmful if swallowed. Use of this product may cause skin reactions in rare cases. Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.

<b>FIRST AID</b>
<b>If in eyes:</b>
• Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.
<b>If swallowed:</b>
• Call a poison control center or doctor immediately for treatment advice.
• Have a 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 doctor.
• Do not give anything by mouth to an unconscious person.
<del><b>If you suspect a reaction to this product:</b></del>
<del>• Discontinue use;</del>
<del>• Take off contaminated clothing;</del>
<del>• Rinse skin immediately with plenty of water for 15-20 minutes;</del>
<del>• Call a poison control center or doctor for treatment advice.</del>
Call a poison control center or doctor for further treatment advice. Have the product label with you when calling a poison control center or doctor, or going for treatment. For additional information in case of emergency call toll free 1-800-255-3924.

**PHYSICAL AND CHEMICAL HAZARDS: FLAMMABLE -**

Keep away from heat, sparks and open flame.

❖ Do not apply to synthetic fabrics such as acetate, rayon or spandex. Will not damage cotton, wool and nylon. May damage furniture finishes, leather, plastics, painted and varnished surfaces including watch crystals, guns, bows and automobiles. Allow repellent to dry before handling bow or gun stock.

Manufactured for:

WPC Brands, Inc.  
Jackson, WI 53037

Made in the U.S.A.

Questions or Comments? Call 800/ 558-6614

EPA Reg. No. 305-29 EPA Est. No. XXX-XX-X

www.wpcbrands.com

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**ACCEPTED**  
**With COMMENTS**  
**In EPA Letter Dated:**  
*July 1, 2009*  
**Under the Federal Insecticide, Fungicide**  
**and Rodenticide Act, As amended, for the**  
**pesticide Registered under EPA Reg. No:**  
**305-29**

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## Master Label

### Optional marketing claims:

- ❖ Provides effective long lasting protection from mosquitoes, ticks, chiggers, black flies, sand flies, deerflies, fleas and other biting insects.
- ❖ Repels mosquitoes, ticks, biting flies, gnats, chiggers and fleas.
- ❖ 55% DEET
- ❖ It works
- ❖ Sports-Active Formula
- ❖ Hunting, Camping, Fishing, all outdoor activities
- ❖ Ready-to-use, unscented insect repellent towelette
- ❖ Zip-Pak<sup>®</sup> Re-sealable Packaging. To open, tear across at notch, remove towel and use immediately - tightly RESEAL. Zip-Pak<sup>®</sup> is a trademark of Illinois Tool Works, Inc.
- ❖ Repels:

Insect	Hours of Protection
Mosquitoes	8 hours
Black flies, gnats, ceratopogonids, no-see-ums, punkies & biting midges	6 hours
Tick & Chiggers	5 hours
Stable flies, horse flies, deer flies and greenheads	3 hours

### Key

- ❖ Optional text/information may or may not be on label.  
(Optional text) – May be left out of text, used in place of preceding text or in conjunction with preceding text.  
*(Italicized – for informational purposes only.*