305 - 30

2/17/2009

1/4

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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

FEB 17 2009

Mr. Eric D. Smith
Regulatory Affairs Manager
WPC Brands, Inc.
P.O. Box 4406
Bridgeton, MO 63044

RE: Notification per PR Notice 98-10 to add an optional Marketing Claim to the label
EPA Registration No.: 305-30
Date of Submission: January 23, 2009

Dear Mr. Smith:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated January 23, 2009, for the product Repel 100. 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,

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

2/4

*Please read instructions on reverse before completing form.* Form Approved. OMB No. 2070-0060. Approval expires 11-30-93

United States Environmental Protection Agency
Office of Pesticide Programs (H7505C)
Washington, DC 20460

EPA

# Application for Pesticide:

- [ ] Registration
- [ ] Amendment
- [x] Other

OPP Identifier Number

## Section I

| 1. Company/Product Number | 2. Product Manager | 3. Proposed Classification |
|---|---|---|
| 305-30 | R. Gebkin | [x] None [ ] Restricted |
| 4. Company/Product (Name) | PM# | |
| Repel 100 | 10 | |

5. Name and Address of Applicant *(include ZIP Code)*
**WPC Brands, Inc.**
**P.O. Box 4406**
**Bridgeton, MO 63044**
[ ] 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 labelling to:

NOTIFICATION
FEB 17 2009

EPA Reg. No. _____
Product Name _____

## Section II

- [ ] Amendment - Explain below
- [ ] Resubmission in response to Agency letter dated _____
- [x] Notification - Explain below.
- [ ] Final printed label in response to Agency letter date
- [ ] "ME TOO" Application.
- [ ] Other - explain below

**Explanation:** Use additional page(s) if necessary. (For section I and Section II.)
**Notification per PR Notice 98-10 to add an optional marketing claim to the label.**
**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 in Which This Product Will Be Packaged:**

| Child-Resistant Packaging | Unit Packaging | Water-Soluble Packaging | 2. Type of Container |
|---|---|---|---|
| [ ] Yes * [ ] No | [ ] Yes [ ] No | [ ] Yes [ ] No | [ ] Metal [ ] Plastic [ ] Glass [ ] Paper [ ] Other *(Specify)* _____ |
| *** Certification must be submitted** | If "YES," Unit package wgt / No. per container | If "YES," Package wgt / No. per container | |

| 3. Location of Net Contents Information | 4. Size(s) of Retail Container | 5. Location of Label Directions |
|---|---|---|
| [ ] Label [ ] Container | | [ ] On Label [ ] On Labeling accompanying product |

6. Manner in Which Label Is Affixed To Product
- [ ] Lithographed
- [ ] Paper glued
- [ ] Stenciled
- [ ] Other _____

## Section IV

1. Contact Point *(Complete items directly below for identification of the individual to be contacted, if necessary, to process this application)*

| Name | Title | Telephone No. (include Area Code) |
|---|---|---|
| Eric D. Smith | Regulatory Affairs Manager | 314-683-2455 |

**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 | 3. Title |
|---|---|
| Eric D. Smith | Regulatory Affairs Manager |
| 4. Typed Name | 5. Date |
| Eric D. Smith | January 23, 2009 |

# Repel 100

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

*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 & fleas.
- 100% DEET* (Formula) * Relative % DEET
- Protects [for] up to 10 hours
- For severe conditions
- Withstands water, perspiration and wear
- The most concentrated insect repellent you can buy
- Effective, Long Lasting Insect Protection
- Pocket Size
- Repels:

| Insect | Hours of Protection |
|---|---|
| Mosquitoes | 10 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 |

- Repels mosquitoes that may carry West Nile virus
- Also repels Ticks, Biting Flies, Gnats, No-See-Ums, Chiggers & Fleas

Active Ingredients:
DEET ..... 98.11%
Other Ingredients ..... 1.89%
Total 100.00%

KEEP OUT OF REACH OF CHILDREN
WARNING. See back panel for precautions.

*Source of AI is from Morflex or MGK:*

Net Contents oz ( mL)

NOTIFICATION
FEB 17 2009

*Back label*

## 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.**

Apply over all exposed skin to repel mosquitoes, ticks and biting flies. Use just enough repellent to cover exposed skin and/or clothing. Do not use under clothing. Do not spray in enclosed areas. Do not spray directly on face. If used on the face, spray on hands first then apply sparingly to face and ears. Do not apply near eyes and mouth. 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.

- Works on clothing too: Spray shirts, pants and hats. For ticks, chiggers and fleas apply to tops of socks and around openings of outer clothing.
- After returning indoors, wash treated skin with soap and water. Wash treated clothing before wearing it again.
- 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.

## STORAGE AND DISPOSAL

**PESTICIDE STORAGE:** Store in a cool, dry place inaccessible to children. Do not contaminate water, food, or feed by storage and disposal.
**CONTAINER DISPOSAL: If empty:** Do not reuse this container. Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency or (1-800-CLEANUP) for disposal instructions. Never place unused product down any indoor or outdoor drain.

## PRECAUTIONARY STATEMENTS

### Hazard to Humans and Domestic Animals

**WARNING.** Causes substantial but temporary eye injury. Do not get in 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 toilet.



4/3

Paragraph format may be used if label is small.

| FIRST AID |
|---|
| **If swallowed:**<br>• Call a Poison Control Center or doctor immediately for treatment advice.<br>• Have person sip a glass of water if able to swallow.<br>• Do not induce vomiting unless told to do so by a Poison Control Center or doctor.<br>• Do not give anything by mouth to an unconscious person. |
| **If in eyes:**<br>• 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. |
| **If you suspect a reaction to this product:**<br>• Discontinue use.<br>• Take off contaminated clothing.<br>• Rinse skin immediately with plenty of water for 15-20 minutes.<br>• Call a Poison Control Center of doctor for 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 1-888-880-1181. |
| **Note to Physician:** Probable mucosal damage may contraindicate the use of gastric lavage. |

**NOTICE: Buyer assumes all responsibility for safety and use not in accordance with directions.**

Made in the USA
WPC Brands, Inc.
PO Box 4406
Bridgeton, Missouri 63044

www.wpcbrands.com

Questions or Comments? Call 1-888-880-1181

EPA Reg. No. 305-30

EPA Est. No. 305-WI-1

NOTIFICATION
FEB 17 2009