305-51 6/24/2009 1/4

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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

June 24, 2009

Mr. William H. Metzger,
Division Vice-President - Regulatory Affairs
WPC Brands, Inc.
P.O. Box 4406
Bridgeton, MO 63044-0406

Subject: Amended Labeling, Response to EPA Letter Dated October 29, 2008
Repel 25 INSECT REPELLENT, EPA Reg. No. 305-51
Your Submission Dated March 16, 2009

Dear Mr. Metzger:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable.

To be eligible for reregistration, aerosol and pump spray formulations must be packaged in containers utilizing a concave trigger to help aim product or other comparable mechanism that will ensure that the product will not be inadvertently sprayed in the eyes. In addition, 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" is enclosed for your records. 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*.

Sincerely Yours,

For Carmen J. Rodia Jr.

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

Enclosure: Label stamped "Accepted"
000305-00051 D409894

Repel 25

INSECT REPELLENT

(either in name or stated separately)

Optional marketing claims:

[29% DEET

Repels: mosquitoes, ticks, biting flies, gnats, fleas & chiggers

Hours of effective ((un)scented) protection from mosquitoes, ticks, black flies, gnats, chiggers, no-see-ums, sand flies, deer flies, fleas, biting flies and other biting insects.

The long-lasting, non-greasy formula provides exceptional effective protection.

Non greasy and resists perspiration

Developed especially for campers, backpackers, fishermen, hunters, golfers, bikers, hikers, joggers, ball players and active outdoor enthusiasts.

Developed especially for outdoor activities when effective protection is needed.

Effective, long lasting ((un)scented) protection

(Un)Scented protection

Long Lasting Protection

Personal Formula

Repels mosquitoes that may carry West Nile Virus

ACCEPTED
June 24, 2009
Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under:
EPA. Reg. No: 305-51

Active Ingredients:

DEET	25.0%
Other Ingredients	75.0%
Total	100.0%

This product contains petroleum distillates.

KEEP OUT OF REACH OF CHILDREN

CAUTION See back panel for precautions.

Net Weight 6.5 oz (184 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.** Hold container 6 to 8 inches from skin or clothing and spray with a slow sweeping motion. Do not spray in enclosed areas. Use just enough repellent to cover exposed skin and/or clothing. Do not use under clothing. 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.

[For use on outer surfaces of clothing: 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.

[Paragraph format may be used if label is small.]

STORAGE AND DISPOSAL

PESTICIDE STORAGE: Store the product in a cool, dry place, out of reach of children.

CONTAINER DISPOSAL: Do not Puncture or Incinerate! **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: 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.

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[Paragraph format may be used if label is small.]

FIRST AID
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 do so by a Poison Control Center or doctor. • Do not give anything by mouth to an unconscious person.
If you suspect a reaction to this product: • Discontinue use. • 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.
Have the product container 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.

Physical and Chemical Hazards

FLAMMABLE - Contents under pressure. Keep away from heat, sparks and open flame. Do not puncture or incinerate container. Exposure to temperatures above 130° F may cause bursting.

[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.]

NOTICE: To the extent consistent with applicable law buyer assumes all responsibility for safety and use not in accordance with directions.

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

[Questions or comments? Call 1-888-880-1181]

www.wpcbrands.com

EPA Reg. No. 305-51

EPA Est. No. 9688-MO-1

@2009