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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

May 3, 2010

William H. Metzger
Regulatory and Government Affairs
WPC Brands, Inc
P.O Box 142642
St. Louis, MO 63114

Subject: Notification to Revise Warranty Statement, Add Marketing Claims, and other Minor Changes per PRNs 98-10 and 2007-4
Product Name: Repel Insect Repellent 30 LE
EPA Reg. No: 305-62
Your Submission Dated March 19, 2010

Dear Mr. Metzger:

The Biopesticides and Pollution Prevention Division is in receipt of your application for Notification under Pesticide Registration Notices (PRNs) 98-10 and 2007-4, dated above. A screen of the request has been conducted for its applicability under PRNs 98-10 and 2007-4, and it has been determined that the action request falls within the scope of these documents. Our records have been duly noted, and the printed label with this application has been stamped "Notification Accepted" and will be placed in our records as current and updated. Should you have any questions regarding this action, you may contact Gina Casciano at (703) 605-0513 or via email at casciano.gina@epa.gov.

Sincerely,

Linda Hollis

Linda A. Hollis, Chief
Biochemical Pesticides Branch
Biopesticides and Pollution
Prevention Division (7511P)

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Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060. Approval expires 2-28-95

EPA

United States
Environmental Protection Agency
Washington, DC 20460

- [ ] Registration
- [ ] Amendment
- [✓] Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 305-62	2. EPA Product Manager Linda Hollis - Branch Chief	3. Proposed Classification [✓] None [ ] Restricted
4. Company/Product (Name) Chemsico Insect Spray PP	PM# 91	
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: Notification Accepted I certify that my product is similar or identical in composition and labeling to: EPA Section 3(c)(3)(b)(i), EPA Reg. No. _____ Date: 5/3/10 Reviewer: G. Casciano Product Name _____	

Section - II

- [ ] Amendment - Explain below.
- [ ] Resubmission in response to Agency letter dated _____
- [ ] Notification - Explain below.
- [ ] Final printed labels in repsonse to Agency letter dated _____
- [ ] "Me Too" Application.
- [ ] Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Application for Amendment by Notification under PR Notice 2007-4 (Pesticide management and Disposal; Standards for Pesticide Containers and Containment [nonrefillable container language]), PR Notice 98-10 (additional sizes, removal of 1-800-CLEANUP, Notice update to current standards and additional of two new marketing claims plus revised marketing claim and general label reformat). See cover letter for details and certification statements.

Section - III

1. Material This Product Will Be Packaged In:

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 Packaging wgt. / No. per container	If "Yes" Package wgt / No. per container	

3. Location of Net Contents Information	4. Size(s) Retail Container	5. Location of Label Directions
[✓] Label [ ] Container	0.5, 1, 2, 3, 4, 6, 8, 9 fl oz.	[✓] on label

6. Manner in Which Label is Affixed to Product: [✓] Lithograph [ ] Paper glued [ ] Stenciled [ ] Other _____

Section - IV

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

Name	Title	Telephone No. (Include Area Code)
William H. Metzger	Division Vice President	314-683-2750

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 knowlingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

6. Date Application Received (Stamped)

2. Signature: William H. Metzger	3. Title: Division Vice President - Regulatory Affairs
4. Typed Name: William H. Metzger	5. Date: March 19, 2010

WPC Brands, Inc.

P.O. Box 4406
Bridgeton, MO 63044

March 19, 2010

United States Environmental Protection Agency
Office of Pesticide Programs
Biopesticides & Pollution Prevention Division 7504P
Document Processing Desk (NOTIF)
Room S4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202-4501

Attention: Ms. Linda Hollis
Chief – Biopesticides Division

Subject: NOTIFICATION: Label Notification per PRN 2007-4 and PRN 98-10

REPEL Insect Repellent 30 LE
EPA Reg. No. 305-62

Please find the enclosed application for notification of the following registration amendments:

A. Pesticide Registration Notice (PR) 2007-4, Final Rule "Pesticide Management and Disposal; Standards for Pesticide Containers and Containment (Nonrefillable Containers):

We have adopted the exact language set forth in PRN 2007-4.

This notification is consistent with the guidance in PR Notice 2007-4 and the requirements of EPA's regulations at 40 CFR 156.10, 156.140, 156.144, 156.146, and 156.156. 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 the amended label is not consistent with the requirement of 40 CFR 156.10, 156.140, 156.144, 156.146, and 156.156, 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.

B. Pesticide Registration (PR) Notice 98-10:

We have updated the label warranty statement in accordance to the EPA's October 17, 2006 Guidance on Warranty Statements. Additionally, we have added additional products sizes (actually a non-notification), removed the 1-800-CLEANUP phrase (actually a non-notification), reformatted the label to be consistent with current Agency policy (Label Review Manual) (placed the Directions immediately after the heading Directions for Use) and added two marketing claims (DEET Free and Contains no DEET) and revised one currently approved marketing claim relating to West Nile virus.

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.

The marketing claim revision modifies the currently approved claim as follows:

Claim 31: Repels mosquitoes including those that may transmit West Nile Virus for up to six hours,
to read
Claim 36: Repels mosquitoes [including those] that may [transmit] [carry] West Nile Virus [for up to six hours]

The addition of the optional claims "DEET Free" and "Contains no DEET" (claims 34 and 35) is consistent with current Biopesticides Division policy as they are 1) factual statements, and 2) have been approved for similar non-DEET repellent products handled by BPPD (for example BullFrog Mosquito Coast EPA Reg. No. 40086-1, BullFrog Mosquito Coast Twilight EPA Reg. No. 40086-2 and Citrepel EPA Reg. No. 84878-2).

In the essence of record-keeping, the following documents are enclosed in support of this submission:

1. Application for Pesticide Amendment by Notification(EPA Form 8570-1)
2. One copy of the proposed label *with all changes highlighted*
3. One clean copy of the proposed label without highlighting
4. A photocopy of the currently approved label accepted 10/7/2005 and the FPL

Please call me at 1-314-683-2750 or via email at: bill.metzger@spectrumbrands.com if you have questions or need further information. Thank you very much for your attention to our application.

Sincerely,

William H. Metzger
Division Vice President – Regulatory and Government Affairs

REPEL

Insect Repellent 30 LE

Notification Accepted

Date: 5/3/10

Reviewer: G. Casciano

KEEP OUT OF REACH OF CHILDREN

WARNING: See back panel for precautions and first aid statements

Active Ingredients:

Oil of Lemon Eucalyptus*	30.0%
Other Ingredients:	70.0%
TOTAL	100.0%

*Approx. 65% p-menthane-3,8-diol

NET 0.5, 1, 2, 3,4, 6, 8, 9 fl oz or other size as appropriate (metric conversion to be included)

OPTIONAL MARKETING LANGUAGE

[Repel Insect Repellent 30 LE is designed to repel mosquitoes for up to six hours. This unique formula is guaranteed to repel mosquitoes and ticks. You can use Repel Insect Repellent 30 LE with confidence knowing that it will not harm your fishing line, camping gear, watch crystals or tackle box. Apply Repel Insect Repellent 30 LE and get your adventure started.]

You can use Repel Insect Repellent 30 LE with confidence knowing that it will not harm your fishing line, camping gear, watch crystals or tackle box. Apply Repel Insect Repellent 30 LE and get your adventure started.

The active ingredient in Repel Insect Repellent 30 LE is derived from the leaves of the Lemon Eucalyptus tree.

STOP. READ ENTIRE LABEL BEFORE EACH USE.

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.**

To repel insects, apply to exposed skin and clothing. For best results, spread evenly with hand to moisten all exposed skin. Do not spray directly on face. To apply to face, dispense on palm of hand and spread on face and neck. Reapply once as needed. Do not apply more than twice per day.

STORAGE AND DISPOSAL: Store the product in a cool, dry place, 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.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

WARNING. Causes substantial but temporary eye injury. Harmful if swallowed. Do not get in eyes. Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. After returning from outdoors, wash product from all exposed skin. Do not allow children to apply this product to themselves. Do not apply to the hands of children. Do not use on children under the age of three years. May cause skin reactions for some people. Discontinue if irritation or rash appears. Do not apply over cuts, wounds or irritated skin.

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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 5 minutes, then continue rinsing. 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 doctor. Do not give anything by mouth to an unconscious person.
Have the product container or label with you when calling a Poison Control Center or doctor, or going for treatment. In case of emergency call 1-800-332-5553.

Physical or Chemical Hazards

COMBUSTIBLE. Do not use or store near heat or open flame.

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

Questions or Comments? Call 1-800-332-5553

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

EPA Reg. No. 305-62

Est. No. 9688-MO-1

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OPTIONAL MARKETING CLAIMS

1. Contains Lemon Eucalyptus Oil
2. Active Ingredient extract of Lemon Eucalyptus
3. Active Ingredient Derived from Plant Extracts
4. Gives Mosquitoes and Ticks the Brush-Off
5. Active Ingredient derived from plant extracts
6. Active Ingredient Derived from Lemon Eucalyptus
7. Contains plant extracts [of Lemon Eucalyptus]
8. Repels [annoying] mosquitoes (and ticks)
9. Delivers up to 6 hours of repellency of Mosquitoes
10. Repels up to 6 hours against mosquitoes
11. Repels mosquitoes for up to 6 hours
12. Won't harm your gear
13. Will not [melt][damage][weaken] your fishing line
14. Will not harm watch crystals, tackle boxes, backpacks, fishing line, tents or bedding.
15. Goes on easy
16. Lemon Eucalyptus scent
17. Cool, refreshing [lemon eucalyptus] scent
18. Fisherman's Formula
19. Botanically-based active ingredient
20. Plant-based active ingredient
21. Effective, Dependable mosquito repellency for up to six hours
22. Unique formula
23. Unique plant-based active ingredient
24. New formula! [to be removed 6 months after first shipment]
25. [Contains][made with] Oil of Lemon Eucalyptus
26. Powered by Citriodiol® Nature's Repellent (logo)
27. Naturally-based active ingredient
28. Active ingredient derived from [the leaves of] the Lemon Eucalyptus tree
29. [By][From][Brought to you by] the makers of Repel®
30. Not Sticky or greasy
31. Repels mosquitoes including those that may transmit West Nile Virus for up to six hours
32. Repels annoying mosquitoes[and ticks]
33. Cool Lemon Eucalyptus scent
34. DEET Free
35. Contains no DEET
36. Repels mosquitoes [including those] that may [transmit] [carry] West Nile Virus for up to six hours