806-14 08/26/2008 1/10

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

August 26, 2008

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

J. Michael Kelley, Ph.D.
Authorized Representative
of Avon Products, Inc.
P.O. Box 363
7140 Heritage Village Plaza
Gainesville, VA 20156

RE: Product Name: Avon Skin-So-Soft SSS Bug Guard Plus IR3535 Insect Repellent Cool N Fabulous SPF 30 Sunscreen Lotion
EPA Reg. No: 806-14
Application for label Notification dated July 21, 2008 to Add Revise Storage and Disposal Section and to Add 1-800-Number in First Aid Section

Dear Dr. Kelley:

The Biopesticides and Pollution Prevention Division is in receipt of your application for Notification under 98-10 dated above. A preliminary screen of this request has been conducted for its applicability under PRN 98-10 and it has been determined that the action(s) requested falls within the scope of PRN 98-10. Our records have been duly noted, and the label submitted with this application has been stamped "Notification, received and reviewed" and will be placed accordingly in our records.

Questions concerning this action should be directed to Ms. Diana Hudson at (703) 308-8713 or email at hudson.diana@epa.gov.

Sincerely,

Linda Hollis

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

2/10

Please read instructions on reverse side before completing form. Form Approved. OMB No. 2070-0060. Approval expires 05-31-98

EPA	United States Environmental Protection Agency Washington, DC 20460	☐ Registration ☐ Amendment ☒ Other	OPP Identifier Number

Application for Pesticide – Section 1

1. Company/Product Number	2. EPA Product Manager	3. Proposed Classification
Avon Products, Inc. / 806-14	**Linda Hollis**	☒ None ☐ Restricted
4. Company/Product (Name) **Avon Skin-So-Soft SSS Bug Guard Plus IR3535® Insect Repellent Cool 'N Fabulous™ SPF 30 Sunscreen Lotion**	PM# **90**	

5. Name And Address Of Applicant *(Include ZIP Code)*

Avon Products, Inc.
1251 Avenue of the Americas
New York, NY 10020

☐ *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 labeling to:

EPA Reg. No. _____

Product Name _____

Section II

NOTIFICATION

☐ Amendment – Explain below.
☐ Resubmission in response to Agency letter dated _____
☒ Notification – Explain below.
☐ Final Printed labels in response to Agency letter dated _____
☐ "Me Too" Application.
☐ Other – Explain Below.

Date Reviewed: 8-26-08
Reviewed By: D. Hudson

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

Notification of addition of 1-800 number in First Aid section and revisions to the Storage and Disposal section.

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 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" Unit Packaging wgt. / No. per Container	

3. Location of Net Contents Information	4. Size(S) 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 individual to be contacted, if necessary, to process this application.)*

Name	Title	Telephone No. (Include Area Code)
J. Michael Kelley, Ph.D. / *toXcel*, LLC	**Avon Authorized Representative**	**(703) 335-5670**

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.

3. Date Application Received

2. Signature	3. Title
FOR	**Avon Authorized Representative (*toXcel*, LLC)**
4. Typed Name	5. Date
J. Michael Kelley, Ph.D.	**July 21, 2008**

3/10

toXcel

Toxicology & Regulatory Affairs
P.O. Box 363
7140 Heritage Village Plaza
Gainesville, VA 20156
USA

Phone: (703) 335-5670 **Fax: (703) 310-6950**

Hand Delivery

July 21, 2008

Ms. Linda Hollis, PM-90
Document Processing Desk (NOTIF)
Biopesticides and Pollution Prevention Division
Office of Pesticide Programs - (7504P)
U.S. Environmental Protection Agency
Room S-4900, 4th Floor, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

RE: Notification of Addition of 1-800 Number to the First Aid section and Revision of Storage and Disposal Labeling for *Avon Skin-So-Soft SSS Bug Guard Plus IR3535® Insect Repellent Cool 'N Fabulous™ SPF 30 Sunscreen Lotion;*
EPA Registration No. **806-14**

Dear Ms. Hollis:

In accordance with Pesticide Registration (PR) Notice 1998-10, the registrant is formally submitting this notification of revisions to the First Aid section and the Storage and Disposal section of the product label, as indicated on the enclosed Notification (EPA Form 8570-1). Based on the guidance in PR Notice 2007-4, the registrant is amending the Storage and Disposal language to comply with the new container regulations located in 40 CFR Part 156 and is also taking the opportunity to update its label format to be consistent with its recently registered products. That is, many of the optional and/or marketing claims appear on the last page of the label.

Regarding the Storage and Disposal section, the registrant has revised the disposal statement of the product label for the above referenced product to read, "DISPOSAL: **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." The recycling statement conforms to PR Notice 2007-4 as well as to PR Notice 2007-1. In addition, all of the registrant's pesticide products bear a batch code. As required by PR Notice 98-10, one "highlighted" copy of the product labeling is enclosed that denotes the changes made as well as one "clean" copy of the label.

4/10

We would appreciate being informed of the acceptance of this notification after it is reviewed. If you have any questions or require additional information or documentation, please do not hesitate to contact me or Micah Reynolds by phone at 703-335-5670 or by email at mike.kelley@toxcel.com or micah.reynolds@toxcel.com, respectively.

Sincerely,

FOR

J. Michael Kelley, Ph.D.
Vice President
Authorized Representative of Avon Products, Inc.

Enclosures

Cc: A. Pechko (Avon)
H. Estriecher (Keller & Heckman)

5/10

FRONT OF CONTAINER

[Original Brand Name]

AVON
S
S
S
SKIN-SO-SOFT
BUG GUARD PLUS
IR3535®
INSECT REPELLENT
SPF 30
MOISTURIZING SUNBLOCK LOTION
COOL 'N FABULOUS™

NOTIFICATION
Date Reviewed: 8-26-08
Reviewed By: D. Hudson

[**Alternate Brand Name #1** (Notification 12/7/01) - Bracketed information confined to use on Disappearing Color Lotion]

AVON
S
S
S
SKIN-SO-SOFT
BUG GUARD
PLUS
IR3535®
INSECT REPELLENT
SPF 30 SUNSCREEN
VERY WATER RESISTANT
WITH VITAMIN E & ALOE
[DISAPPEARING COLOR]
COOL 'N FABULOUS™

[**Alternate Brand Name #2** – Bracketed information confined to use on Disappearing Color Lotion]

AVON
SKIN-SO-SOFT
S BUG
S GUARD
S *PLUS*
IR3535®
INSECT REPELLENT
COOL 'N FABULOUS™
[DISAPPEARING COLOR]
SPF 30 SUNSCREEN
VERY WATER RESISTANT
MOISTURIZING LOTION

FOLLOWING IS APPLICABLE ALL FRONT LABELS [Bracketed information is optional package size]:

KEEP OUT OF REACH OF CHILDREN
CAUTION

ACTIVE INGREDIENTS:

beta-alanine, n-acetyl-N-butyl-, ethyl ester* / carboxylic acid	7.5%
OTHER INGREDIENTS:	92.5%
TOTAL:	100.0%

* IR3535®

4 FL. OZ. (118 ml) [2.5 FL. OZ. (75 ml)]

6/10

BACK OF CONTAINER

[Bracketed information confined to use on Disappearing Color Lotion]

DIRECTIONS FOR USE: It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Apply liberally and evenly before sun and insect exposure. An adult must apply this product to children under 10. For continued insect protection, reapply about every 2 hours or sooner if effectiveness diminishes. For sunscreen protection, reapply as needed or after towel drying, swimming, or sweating. Do not exceed 9 applications per day.

STORAGE AND DISPOSAL:
STORAGE: Store in cool, dry place away from heat or flame. DISPOSAL: **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. **Caution.** For external use only. Causes moderate eye irritation. Do not get in eyes. Stop use and ask a doctor if rash or irritation develops and lasts. Ask a doctor before using on children under 6 months of age.

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 eye. • Call a poison control center or doctor for treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-FOR-AVON for emergency medical treatment information.	

ACTIVE SUNSCREEN INGREDIENTS: Octinoxate 7.5%, Oxybenzone 6%, Octisalate 5%

OTHER INGREDIENTS: Water, Butylene Glycol, Glycerin, PVP/Eicosene Copolymer, Aloe Barbadensis Gel, Isostearic Acid, Propylene Glycol Myristyl Ether Acetate, Stearic Acid, Benzyl Alcohol, Cetyl Alcohol, DEA-Oleth-3 Phosphate, Diglycol/CHDM/Isophthalates/SIP Copolymer, Dimethicone, Glyceryl Stearate, Magnesium Aluminum Silicate, Tocopheryl Acetate, Barium Sulfate, Fragrance, Imidazolidinyl Urea, Xanthan Gum, Disodium EDTA, [Blue 1], [Red 33]

TO ORDER, SEE AN AVON REPRESENTATIVE, OR CALL 1-800-FOR-AVON www.avon.com
Not for sale or use after expiration date.
EPA Reg. No. 806-14 EPA Est. No. 806-IL-1
AVON PRODUCTS, INC., DISTR.
1251 AVE. OF THE AMERICAS, NEW YORK, N.Y. 10020
©AVON 200X - ALL RIGHTS RESERVED

Day Lot Code
Exp. Year / Month

7/10

Note to reviewer: The following statements, including those within brackets, are optional AND may appear on the product label AND / OR in marketing collateral materials AND the use of punctuation marks for each statement is optional

[Bracketed information confined to use on Disappearing Color Lotion]

IR3535® is a registered trademark of Merck KGaA

Avoid contact with plastics, costume jewelry, leather and synthetic fibers

May damage painted or varnished surfaces, including nail polish

With vitamin E and aloe

REPELLENCY – IR3535® provides effective and dependable repellency against mosquitoes, deer ticks, black flies, sand flies, gnats, no-seeums and biting midges

Suitable for the entire family

Mild gentle formula does not need to be washed off when returning from the outdoors

Pediatrician-Tested

Hypoallergenic

SPF 30 very water resistant

Helps prevent sunburn

Higher SPF gives more sunburn protection

Retains SPF after 80 minutes of activity in the water or sweating

PABA-Free

Moisturization

Non greasy formula helps replenish moisture and leaves skin soft and smooth

[Disappearing color has a] Fresh summer scent developed especially for the entire family

[Care of Fabrics:

Color can be cleaned from most fabrics

Avoid direct contact with silk, nylon and cotton

Color does not stain skin

If necessary, color can be cleaned from skin with soap and water]

8/10

FRONT OF CONTAINER

[Original Brand Name]

AVON
S
S
S
SKIN-SO-SOFT
BUG GUARD PLUS
IR3535®
INSECT REPELLENT
SPF 30
MOISTURIZING SUNBLOCK LOTION
COOL 'N FABULOUS™

NOTIFICATION
Date Reviewed: 8-26-08
Reviewed By: D. Hudson

[**Alternate Brand Name #1** (Notification 12/7/01) - Bracketed information confined to use on Disappearing Color Lotion]

AVON
S
S
S
SKIN-SO-SOFT
BUG GUARD
PLUS
IR3535®
INSECT REPELLENT
SPF 30 SUNSCREEN
VERY WATER RESISTANT
WITH VITAMIN E & ALOE
[DISAPPEARING COLOR]
COOL 'N FABULOUS™

[**Alternate Brand Name #2** – Bracketed information confined to use on Disappearing Color Lotion]

AVON
SKIN-SO-SOFT
S BUG
S GUARD
S *PLUS*
IR3535®
INSECT REPELLENT
COOL 'N FABULOUS™
[DISAPPEARING COLOR]
SPF 30 SUNSCREEN
VERY WATER RESISTANT
MOISTURIZING LOTION

FOLLOWING IS APPLICABLE ALL FRONT LABELS [Bracketed information is optional package size]:

KEEP OUT OF REACH OF CHILDREN
CAUTION

ACTIVE INGREDIENTS:

beta-alanine, n-acetyl-N-butyl-, ethyl ester* / carboxylic acid	7.5%
OTHER INGREDIENTS:	92.5%
TOTAL:	100.0%

* IR3535®

4 FL. OZ. (118 ml) [2.5 FL. OZ. (75 ml)]

9/10

BACK OF CONTAINER

[Bracketed information confined to use on Disappearing Color Lotion]

DIRECTIONS FOR USE: It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Apply liberally and evenly before sun and insect exposure. An adult must apply this product to children under 10. For continued insect protection, reapply about every 2 hours or sooner if effectiveness diminishes. For sunscreen protection, reapply as needed or after towel drying, swimming, or sweating. Do not exceed 9 applications per day.

STORAGE AND DISPOSAL:
STORAGE: Store in cool, dry place away from heat or flame. DISPOSAL: **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. **Caution.** For external use only. Causes moderate eye irritation. Do not get in eyes. Stop use and ask a doctor if rash or irritation develops and lasts. Ask a doctor before using on children under 6 months of age.

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 eye. • Call a poison control center or doctor for treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-FOR-AVON for emergency medical treatment information.	

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OTHER INGREDIENTS: Water, Butylene Glycol, Glycerin, PVP/Eicosene Copolymer, Aloe Barbadensis Gel, Isostearic Acid, Propylene Glycol Myristyl Ether Acetate, Stearic Acid, Benzyl Alcohol, Cetyl Alcohol, DEA-Oleth-3 Phosphate, Diglycol/CHDM/Isophthalates/SIP Copolymer, Dimethicone, Glyceryl Stearate, Magnesium Aluminum Silicate, Tocopheryl Acetate, Barium Sulfate, Fragrance, Imidazolidinyl Urea, Xanthan Gum, Disodium EDTA, [Blue 1], [Red 33]

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Day Lot Code
Exp. Year / Month

10/10

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IR3535® is a registered trademark of Merck KGaA

Avoid contact with plastics, costume jewelry, leather and synthetic fibers

May damage painted or varnished surfaces, including nail polish

With vitamin E and aloe

REPELLENCY – IR3535® provides effective and dependable repellency against mosquitoes, deer ticks, black flies, sand flies, gnats, no-seeums and biting midges

Suitable for the entire family

Mild gentle formula does not need to be washed off when returning from the outdoors

Pediatrician-Tested

Hypoallergenic

SPF 30 very water resistant

Helps prevent sunburn

Higher SPF gives more sunburn protection

Retains SPF after 80 minutes of activity in the water or sweating

PABA-Free

Moisturization

Non greasy formula helps replenish moisture and leaves skin soft and smooth

[Disappearing color has a] Fresh summer scent developed especially for the entire family

[Care of Fabrics:

Color can be cleaned from most fabrics

Avoid direct contact with silk, nylon and cotton

Color does not stain skin

If necessary, color can be cleaned from skin with soap and water]