

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460



OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

October 23, 2014

Mr. Steven Ditto  
Regulatory Affairs Manager  
McLaughlin Gormley King Company  
8810 Tenth Ave. North  
Minneapolis, MN 55427

Subject: Label Amendment – Refine Label Instructions  
Product Name: ESD 12101  
EPA Registration Number: 1021-2618  
Application Date: July 31, 2014  
Decision Number: 494505

Dear Mr. Ditto:

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

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6. If you have any questions, please contact Driss Benmhend by phone at (703) 308-9525, or via email at [benmhend.driss@epa.gov](mailto:benmhend.driss@epa.gov).

Sincerely,

A handwritten signature in black ink that reads "Richard J. Gebken".

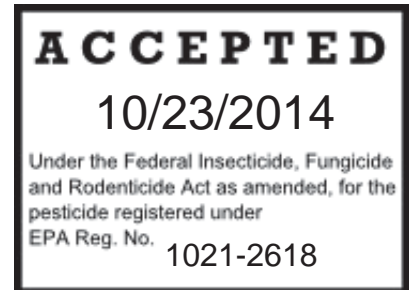
Richard Gebken  
Product Manager 10  
Insecticide Branch  
Office of Pesticide Programs  
Date: October 23, 2014

Enclosure

# ESD 12101

For Outdoor Use Only

- [Repels [protects against] [biting] mosquitoes, including those that may transmit encephalitis,[Chikungunya] [West Nile Virus], [Eastern equine encephalitis], [Western equine encephalitis], [La Crosse encephalitis], [California encephalitis], [St. Louis encephalitis] and [dengue].
- Repels mosquitoes
- Repels [biting] mosquitoes
- Provides effective mosquito protection
- Fast-acting mosquito protection
- Easy to Use
- Convenient
- No Mess, no sprays, no creams
- Non-Staining
- Odorless
- Unscented
- Repellent you don't apply to [spray on] clothes [or skin].
- Repellent is odorless, [silent] [and invisible area of protection]]



{Additional alternate bullets at end of label}

ACTIVE INGREDIENT:	
Metofluthrin .....	4.0%
*OTHER INGREDIENTS .....	96.0%
	100.0%

\* Contains petroleum distillate

## KEEP OUT OF REACH OF CHILDREN CAUTION

See [side (back) panel] [inside (outside) packaging] insert for additional precautions

**PRECAUCION AL CONSUMIDOR:** Si usted no lee inglés, no utilice este producto hasta que la etiqueta le haya sido explicada ampliamente.  
**(TO THE USER:** If you cannot read English, do not use this product until the label has been fully explained to you.)

FIRST AID	
IF SWALLOWED:	Immediately call a poison control center or doctor. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give <b>any</b> liquid to the person. Do not give anything by mouth to an unconscious person.
HOT LINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. In case of Medical emergencies or health and safety inquiries or in case of fire, leaking or damaged containers, information may be obtained by calling 1-888-740-8712.	
NOTE TO PHYSICIAN	
Contains petroleum distillate – vomiting may cause aspiration pneumonia.	

Manufactured by  
  
8810 Tenth Avenue North  
Minneapolis, MN 55427

EPA Reg. No. 1021-2618

EPA Est. No. 1021-MN-2

Net Contents: Contains a total of 1.52 fl. oz. (45ml) to 13.52 fl. oz. (400 ml)  
Net Contents: Contains a total of 0.81 fl. oz. (24ml) to 6.48 fl. oz. (192 ml)

{Product Name with fixture}

Contains: 1 to 8 Fixture(s) [Device(s)] [Unit(s)] and 1 x 0.81 fl. oz. (24 ml) to 8 x 0.81 fl. oz. or 1 x 1.52 fl. oz. (45 ml) to 8 x 1.52 fl. oz. (45 ml) or 1 x 1.69 fl. oz. (50 ml) to 8 x 1.69 fl. oz. (50 ml) Bottle Name [Repellent Bottle(s)] [Repellent Cartridge(s)] [Repellent Refill(s)]

{Bottle only}

Contain(s): 1 x 0.81 fl. oz. (24ml) to 8 x 0.81 fl. oz. (24 ml) or 1 x 1.52 fl. oz. (45 ml) to 8 x 1.52 fl. oz. (45 ml) or 1 x 1.69 fl. oz. (50 ml) to 8 x 1.69 fl. oz. (50 ml) Bottle Name [Repellent Bottle(s)] [Repellent Cartridge(s)] [Repellent Refill(s)]

Lot Number:

PRECAUTIONARY STATEMENTS  
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

# CAUTION

Harmful if swallowed. Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

## ENVIRONMENTAL HAZARDS

Do not apply to water.

## DIRECTIONS FOR USE

It is a violation of Federal Law to use this product  
in a manner inconsistent with its labeling.

For use outdoors on patios, decks, unenclosed porches, walkways, around swimming pools and other areas where mosquito protection is desired.

Do not use indoors.

Do not pry ESD12101 [Bottle Name] [Repellent Bottle] [Repellent Cartridge] [Repellent Refill] open.

For best results [protection] [coverage] [for a typical sized deck or patio] place [install] one fixture [Product Name] [Device] [Unit] every 10 to 12 ft. around [throughout] the area you wish to protect [from biting mosquitoes].

A set of 4 Fixtures [Devices] [Units] provides up to 440 square feet of mosquito protection.  
[A set of 6 Fixture [Device] [Unit] provides up to 660 square feet of mosquito protection.]

The Vaporizer [Liquid] [Repellent] [Emanator] works [operates] independently from [with or without] the Light [Light Fixture] [Lamp] [LED].

The Vaporizer [Liquid] [Repellent] [Emanator] should be turned off when not in use.

The Vaporizer [Liquid] [Repellent] [Emanator] will get hot while in use. Always allow Vaporizer [Liquid] [Repellent] [Emanator] to cool before replacing with ESD12101 [Bottle Name] [Repellent Bottle] [Repellent Cartridge] [Repellent Refill].  
After 6 weeks of use, Open [Remove] Fixture [device] cover and visually inspect ESD12101 [Bottle Name] [Repellent Bottle] [Repellent Cartridge] [Repellent Refill] to determine usage rate.

The claimed hours of repellency are an average based on lab testing, and presume using 90% of repellent provided. The last 10% of repellent is not claimed, as repellency effectiveness may diminish with reduced wick exposure. Your repellent usage rate will vary based on the temperature and relative humidity.

The Vaporizer [Liquid] [Repellent] [Emanator] power-on indicator light will flash when device has been operated for approximately 195 hours, indicating that ESD12101 [Bottle Name] [Repellent Bottle] [Repellent Cartridge] [Repellent Refill] has about 20 hours remaining of effective operating life. We recommended that you check the ESD12101 [Bottle Name] [Repellent Bottle] [Repellent Cartridge] [Repellent Refill] and replace it before it is empty, or when you notice increased mosquito activity.

Replace when ESD12101 [Bottle Name] [Repellent Bottle] [Repellent Cartridge] [Repellent Refill] is empty.

Replace ESD12101 [Bottle Name] [Repellent Bottle] [Repellent Cartridge] [Repellent Refill] when power to device is [turned] off.

Do not insert [use] anything other than ESD12101 [Bottle Name] [Repellent Bottle] [Repellent Cartridge] [Repellent Refill] in [to] the Fixture [product name] [Device] [Unit].

### **Operating Instructions: [Please refer to detailed instructions provided with the (Product name)]**

Use[transformer] [optional controller] photo sensor, [timer] [or switch] to operate [to turn on] Vaporizer [mosquito repellent] [repellent] [mosquito protection] [system] [device] [Liquid] [Repellent] [Emanator].

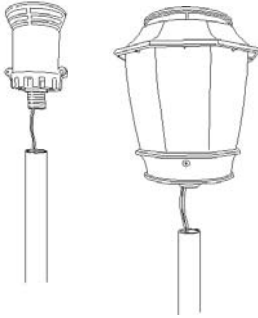
Use[transformer][optional controller] photo sensor, [timer,] [or switch] to operate [turn on] Light [Light Fixture] [Lamp] [LED].

Use with 12v transformer and controller provided [available separately].

### **Installation instructions – [Please refer to detailed instructions provided with the (Product name)]**

[Turn off electricity at main circuit breaker panel before beginning installation.] Consult local building codes to ensure compliance with wiring and grounding requirements.

- 1) Attach each Fixture [Device] [Unit] to post or stem, using hardware provided making sure Fixture [Device] [Unit] is level.



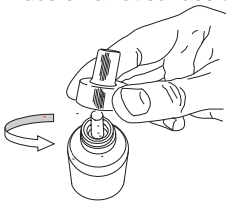
- 2) Connect Vaporizer [Liquid] [Repellent] [Emanator] and Light [Light Fixture] [Lamp] [LED] wires to controlled 12v power source, [or use [Product name] Controller and Transformer].
- 3) Place [Install] one ESD12101 [product name] [Fixture] [Device] [Unit] every 10 to 12 feet.

If you have any questions about wiring, get assistance from a professional electrical contractor.

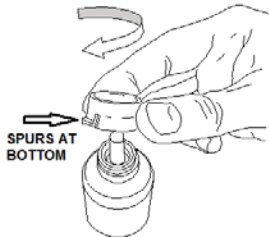
**When using for the first time [For first time] [Initial] Use:**

**How to insert** ESD12101 [Bottle Name] [Repellent Bottle] [Repellent Cartridge] [Repellent Refill] Into Fixture [Device] [Unit].

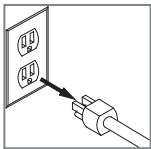
1. Remove 1 (one) ESD12101 [Bottle Name] [Repellent Bottle] [Repellent Cartridge] [Repellent Refill] from packaging.
2. Place on a flat surface and remove protective cap.



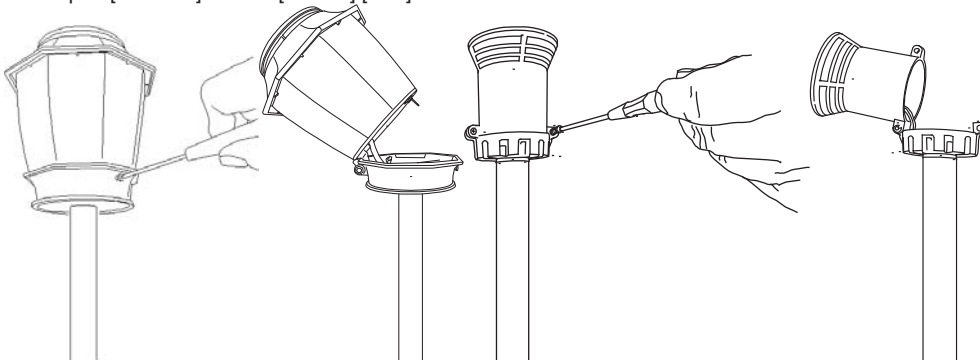
3. Attach locking adaptor cap to bottle with spurs at bottom, closest to bottom of bottle, and turn until secure. Once attached properly, this cap is not removable.



4. Unplug [Disconnect power to] Fixture [Device] [Unit].

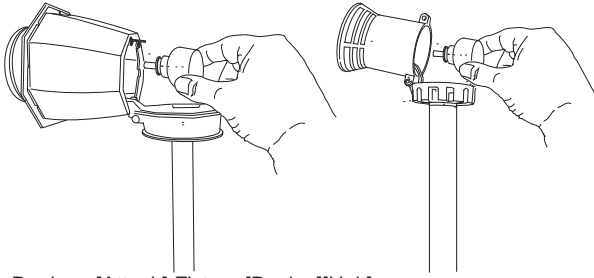


5. Open [Remove] Fixture [Device] [Unit] cover.

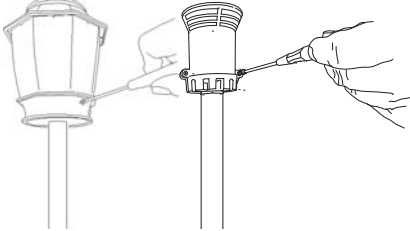


6. Ensuring that the locking adaptor cap is secured to the [Repellent Bottle] [Repellent Cartridge] [Repellent Refill], , carefully insert ESD12101 [Bottle Name]

[Repellent Bottle] [Repellent Cartridge] [Repellent Refill] into fixture so that top of wick fits into Vaporizer [Liquid] [Repellent] [Emanator] and rotate about 30 degrees to secure to fixture.



7. Replace [Attach] Fixture [Device][Unit] cover.

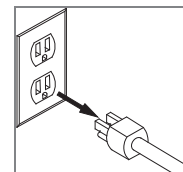


8. Repeat for each Fixture [Device][Unit][reconnect power]

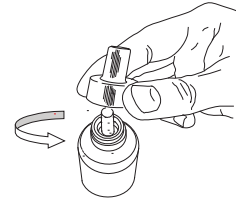
9. When finished, plug in Fixture [Device][Unit][reconnect power].

**How to replace empty** ESD12101 [Bottle Name] [Repellent Bottle] [Repellent Cartridge] [Repellent Refill] into fixture [device].

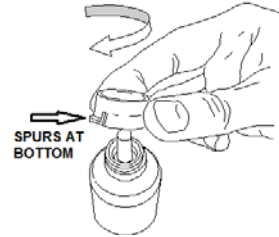
1. Unplug [Disconnect power to] Fixture [Device] [Unit]. If Vaporizer [Liquid] [Repellent] [Emanator] has been operating, allow at least 1 hour to cool down before handling.
2. Remove 1 (one) ESD12101 [Bottle Name] [Repellent Bottle] [Repellent Cartridge] [Repellent Refill] from packaging.



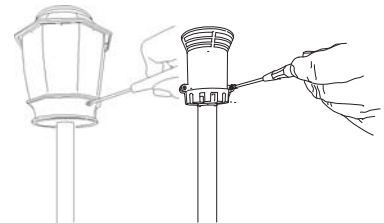
3. Place on a flat surface and remove protective cap



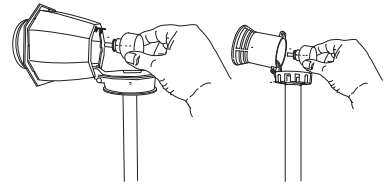
4. Attach locking adaptor cap to bottle with spurs at bottom, closest to bottom of bottle, and turn until secure. Once attached properly, this cap is not removable.



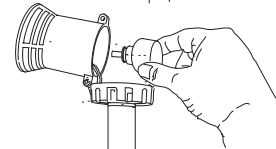
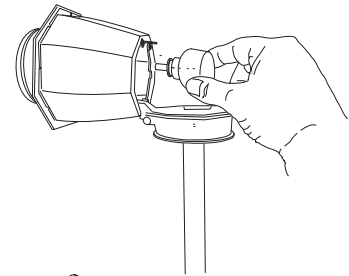
5. Open [Remove] Fixture [Device] [Unit] cover.



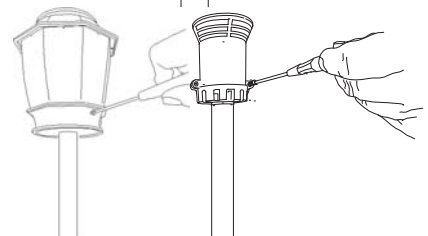
6. Remove used [empty] ESD12101 [Bottle Name] [Repellent Bottle] [Repellent Cartridge] [Repellent Refill] From assembly.



7. Ensuring that the locking adaptor cap is secured to the [Repellent Bottle] [Repellent Cartridge] [Repellent Refill], carefully insert ESD12101 [Bottle Name] [Repellent Bottle] [Repellent Cartridge] [Repellent Refill] into fixture so that top of wick fits into Vaporizer [Liquid] [Repellent] [Emanator] and rotate about 30 degrees to secure to fixture.



8. Replace [re-attach][Fixture][Device][Unit]cover.



9. Repeat for each Fixture [Device][Unit].
10. When finished, plug in Fixture [Device][Unit][reconnect power].

## STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal of repellent unit.

**Pesticide Storage:** Store in a cool, dry place. Keep container tightly closed. Store refills out of direct sunlight

**Pesticide Disposal and Container Handling:** Non-refillable [liquid vaporizer] [bottle] [cartridge] [container]. Do not reuse or refill this [liquid vaporizer] [bottle] [cartridge] [container]. **If empty or at the end of the season, dispose of unused portion according to label directions:** Place in trash. **If partly filled:** Call your local solid waste agency for disposal instruction. Never place unused product down any indoor or outdoor drain.

### IMPORTANT: READ BEFORE USE

Read the entire Directions for Use, Conditions, Disclaimer of Warranties and Limitations of Liability before using this product. If terms are not acceptable, return the unopened product container at once.

By using this product, user or buyer accepts the following conditions, disclaimer of warranties and limitations of liability.

**CONDITIONS:** The directions for use of this product are believed to be adequate and must be followed carefully. However, it is impossible to eliminate all risks associated with the use of this product. Ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of MGK. All such risks shall be assumed by the user or buyer.

**DISCLAIMER OF WARRANTIES:** TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, MGK MAKES NO OTHER WARRANTIES, EXPRESS OR IMPLIED, OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE OR OTHERWISE, THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. No agent of MGK is authorized to make any warranties beyond those contained herein or to modify the warranties contained herein. To the extent consistent with applicable law, MGK disclaims any liability whatsoever for special, incidental or consequential damages resulting from the use or handling of this product.

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[Or alternate text

*Note [Notice]: Seller warrants that this product complies with the specifications expressed in this label. To the extent consistent with applicable law, seller makes no other warranties, and disclaims all other warranties, express or implied, including but not limited to warranties of merchantability and fitness for the intended purpose. To the extent consistent with applicable law, seller's liability or default, breach or failure under this label shall be limited to the amount of the purchase price. To the extent consistent with applicable law, seller shall have no liability for consequential damages.]*

[Or alternate text

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

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[[Fixture] [Device] [Unit] made in (country of Origin)]

[[Bottle Name] [Repellent Bottle] [Repellent Cartridge] [Repellent Refill] made in (country of origin)]



8810 Tenth Avenue North  
Minneapolis, MN 55427

### {Additional alternate bullets}

- [For optimal performance activate within 15 minutes of use
- Provides protection within 15 minutes of use
- Contains 1 [2] [3] [4] [5] [6] [7] [8] ESD12101 [Bottle Name] [Repellent Bottle] [Repellent Cartridge] [Repellent Refill] [(s) [for product name].
- Includes 1 (one) [2 (two)] [3 (three)] [4 (four)] [5 (five)] [6 (six)] [7 (seven)] [8 (eight)]
- ESD12101 [Bottle Name] [Repellent Bottle] [Repellent Cartridge] [Repellent Refill]
- Available [in] single pack [multi pack] [2 pack] [4 pack] [6 pack] [8 pack]
- Effective, season-long\* mosquito protection for your entire deck, porch or patio
- Attractive light fixtures that protect your outdoor patio, [unenclosed porch], [walkway] [or deck] area from [biting] mosquitoes all season\*
- Attractive lights enhance your patio, unenclosed porch, deck, walkways or yard
- Each Fixture [Product Name] [Device] [Unit] contains a Vaporizer [Liquid] [Repellent] [Emanator] [that] releases an odorless, invisible repellent [that] [and] protects up to 110 square feet (sq. ft) (SF)
- Protects [up to] a 110 sq. ft. area
- Protects [provides] a 10 to 12-ft. diameter [area] [of repellency]
- 110 ft2 (square feet) (SF) [area] [zone] of protection [from biting mosquitoes] from each Fixture [Product Name] [Device] [Unit]

- Use [Recommend using] four [4] Fixture [Device] [Unit] on a typical [average] sized deck, patio or outdoor area [for] [provides] over 440 square feet [sq ft] of coverage
  - Use [Recommend using] six [6] Fixture [Device] [Unit] on a large [typical] [average] sized deck, patio or outdoor area [for] [provides] over 660 square feet [sq ft] of coverage
  - Fixture [Product Name] [Device] [Unit] produces an invisible area [cloud] [zone] of protection which repels [biting] mosquitoes
  - Fixture [Product Name] [Device] [Unit] produces invisible [odorless] vapor to repel [that repels] [biting] mosquitoes
  - Vaporizer [Liquid] [Repellent] [Emanator] produces an invisible area [cloud] [zone] of protection which repels [biting] mosquitoes
  - Vaporizer [Liquid] [Repellent] [Emanator] produces invisible [odorless] vapor to repel [that repels] [biting] mosquitoes
  - [Each] 45 ml (1.52 fl oz) ESD12101 [Bottle Name] [Repellent Bottle] [Repellent Cartridge] [Repellent Refill] provide(s) Season-Long\* mosquito protection
  - [Each] 45 ml (1.52 fl oz.) ESD12101 [Bottle Name] [Repellent Bottle] [Repellent Cartridge] [Repellent Refill] provide(s) 90 days [3 months] of mosquito protection 4.5 hours per day
  - [Each] 45 ml (1.52 fl oz) ESD12101 [Bottle Name] [Repellent Bottle] [Repellent Cartridge] [Repellent Refill] provide(s) 400 [total] hours of mosquito protection
  - [Included] [Each] 50 ml (1.69 fl oz) ESD12101 [Bottle Name] [Repellent Bottle] [Repellent Cartridge] [Repellent Refill] provide(s) Season-Long\*\* mosquito protection
  - [Each] 50 ml (1.69 fl oz.) ESD12101 [Bottle Name] [Repellent Bottle] [Repellent Cartridge] [Repellent Refill] provide(s) 90 days [3 months] of mosquito protection [5 hours per day]
  - [Each] 50 ml (1.69 fl oz) ESD12101 [Bottle Name] [Repellent Bottle] [Repellent Cartridge] [Repellent Refill] provide(s) 455 [total] hours of mosquito protection
  - Replace ESD12101 [Bottle Name] [Repellent Bottle] [Repellent Cartridge] [Repellent Refill] for each Fixture [Device] [Unit] after [90 days] [400 hours] [455 hours] of use
  - [Each] 24 ml (0.81 fl oz.) ESD12101 [Bottle Name] [Repellent Bottle] [Repellent Cartridge] [Repellent Refill] provide(s) Season-Long\*\*\* mosquito protection
  - [Each] 24 ml (0.81 fl oz.) ESD12101 [Bottle Name] [Repellent Bottle] [Repellent Cartridge] [Repellent Refill] provide(s) 90 days [3 months] of mosquito protection 2.4 hours per day
  - [Each] 24 ml (0.81 fl oz.) ESD12101 [Bottle Name] [Repellent Bottle] [Repellent Cartridge] [Repellent Refill] provide(s) 216 [total] hours of mosquito protection
    - \*assumes season as 90 days [3 months]/ average use 4.5 hours per day [45 ml fill]
    - \*\*assumes season as 90 days [3 months]/ average use 5.0 hours per day [50 ml fill]
    - \*\*\* assumes season as 90 days [3 months]/ average use 2.4 hours per day [24 ml fill]
- 
- [ESD12101 with] Mosquito Protection Technology
  - [Patented] Patent Pending Mosquito Protection Technology[System]
  - Easy to install
  - No batteries [required]
  - No open flame
  - No candles
  - Powered by low voltage electricity
  - No butane [required]
  - No external fuel required
  - Use[program] timer [photosensor] [or switch] to turn on Vaporizer [mosquito repellent] [repellent] [system] [device] [mosquito protection] [Liquid] [Repellent] [Emanator].
  - Use[program] photo sensor, [timer,] [or switch] to turn on lights.
  - Use [optional] controller [available separately] to independently operate lights and control Vaporizer [mosquito repellent] [repellent] [system] [Liquid] [Repellent] [Emanator] [mosquito protection].
  - Lights [Lighting] [Light] [Light Fixture] [Lamp] [LED] may be used independently of Vaporizer [mosquito repellent] [repellent] [system] [Liquid] [Repellent] [Emanator] [mosquito protection].
  - Durable [metal and glass] construction will provide beautiful lighting [and mosquito protection] for years to come
  - Efficient LEDs [use less power for year-round energy savings] [and] [last up to 20,000 [30,000] hours]
  - Plus attractive, low-voltage outdoor lighting for that perfect summer evening.
  - It's as easy as turning on the lights to say goodbye to [biting] mosquitoes and the old hassles of keeping them away for the entire summer!
  - Use on patios, [unenclosed porches,] [decks,] [walkways,] [yards] and other outdoor areas where mosquito protection is desired [required] [needed].
  - Designed to mount [sit] on [existing] deck post, railing or a stake in the ground.
  - Permanent, low voltage [lighting] [fixtures] are easy to install using [a supplied] [available][an available] transformer and low voltage wire.
  - Use with 12v transformer and controller [included] [available separately]
  - Control with timer, [photo sensor] [or switch] for lighting and/or repellent when you want them, [day or night]
  - Vaporizer [Liquid] [Repellent] [Emanator] can operate [be used] independently of lights [with or without] [having] lights on
  - Refillable light(ing) fixtures ESD12101 [Bottle Name] [Repellent Bottle] [Repellent Cartridge] [Repellent Refill]
  - Free ESD12101 [Bottle Name] [Repellent Bottle] [Repellent Cartridge] [Repellent Refill] included
  - Extra refill included
  - Buy one get one free
  - Coupon [\$] Rebate(s) available [inside]
  - ESD12101 [Bottle Name] [Repellent Bottle] [Repellent Cartridge] [Repellent Refill] works with [in] [product name]
  - ESD12101 [Bottle Name] [Repellent Bottle] [Repellent Cartridge] [Repellent Refill]
  - Specially designed for use with [in] product name
  - For protection and added comfort outdoors
  - Works [when you want it] [day] [and] [or] night]
  - [Helps you] enjoy your evening activities with fewer [less] annoying [biting] mosquitoes.
  - Simply turn [switch] off the Vaporizer [Liquid] [Repellent] [Emanator] when protection is not needed.
  - Won't harm plants, [flowers], [shrubs] or [and] [grass] [lawns]



- Illuminated [Green] [Yellow] [Orange] [Blue] LED indicator [light] on [fixture] [device] indicates [signals] that Vaporizer [Liquid] [Repellent] [Emanator] is operating. ]
- [Green] [Yellow] [Orange][Blue] LED indicator [light] on [fixture] [device] will flash [after 195 hours] to indicate it is time to [check] [and] [or] [replace] ESD12101 [Bottle Name] [Repellent Bottle] [Repellent Cartridge] [Repellent Refill] level
- Reset timer when ESD12101 [Bottle Name] [Repellent Bottle] [Repellent Cartridge] [Repellent Refill] has been replaced to begin another 195 hour countdown.
- Convenient protection from [biting] mosquitoes
- Built-in timer signals when it's time to replace ESD12101 [Bottle Name] [Repellent Bottle] [Repellent Cartridge] [Repellent Refill]
- Effective against all types of mosquitoes
- Discreet, low-profile fixtures blend in to landscape
- Add to an existing [LV] [low voltage] lighting system or install with transformer and wire

**Individual Small Bottle Label**

ESD12101 [Bottle Name] [Repellent Bottle] [Repellent Cartridge] [Repellent Refill]

ACTIVE INGREDIENT:

Metofluthrin .....	4.0%
*OTHER INGREDIENTS .....	96.0%
	<u>100.0%</u>

\* Contains petroleum distillate

EPA Reg. No. 1021-2618

EPA Est. No. 1021-MN-2

KEEP OUT OF REACH OF CHILDREN

**CAUTION**

See [outside] [Bottle Name] [Repellent Bottle] [Repellent Cartridge] [Repellent Refill] packaging [carton] [insert] for precautions and directions for use