

DEC 21 1999

Mr. James H. Wallace, Jr.
 S.C. Johnson & Son, Inc.
 1525 Howe Street
 Racine, WI 53403

Dear Mr. Wallace:

Subject: Revised Labeling and Alternate Formulation Requests
 Repellent LMO, EPA Reg. No. 4822-469
 Submissions dated November 18, 1999

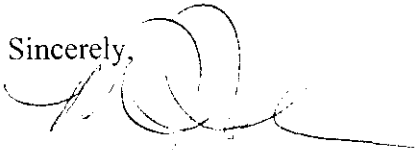
The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments listed below. Three copies of the finished labeling must be submitted prior to releasing the product for shipment.

1) Since references are made to gardening on your label, you should add the following statement to the Precautionary Statements paragraph: "Avoid contamination of food and feedstuffs".

2) Remove all references to "safe" in accordance with 40 CFR 156.10(a)(5)(ix).

Additionally, the revised Confidential statement of Formula (dated November 18, 1999), submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable. A copy has been placed in the respective file as a matter of record. However, the "basic formulation" box was selected on your proposed CSF, and your cover letter indicates that your proposal should be considered as an alternate formulation. You should clarify your intentions so that your that the file contains unambiguous information. Therefore, either resubmit a "corrected" CSF and/or indicate that this revised "basic" formulation will replace all previous formulations for your product.

Sincerely,


 Marion J. Johnson, Jr.
 Product Manager

Insecticide Branch

Registration Division (7505C)

SYMBOL

SURNAME

DATE

(text appearing in parentheses is optional)

Repellent LMO

ACTIVE INGREDIENT

d-cis/trans allethrin 21.97%

INERT INGREDIENTS..... 78.03%

KEEP OUT OF REACH OF CHILDREN

CAUTION

(SEE (BACK) (SIDE) PANEL (INSERT) FOR ADDITIONAL PRECAUTIONARY STATEMENTS)

or

(FOR DETAILED DIRECTIONS FOR USE AND SAFETY INFORMATION, SEE INSERT
(INSTRUCTION SHEET) INSIDE (CARTON) (BOX).)

(STARTER PACKAGE) (CONTAINS) (CONTENTS):

(1) (2) (3) (4) (5) (6) (Reusable) (Disposable) Device(s)

(1) (2) (3) (4) (5) (6) (Fuel Cartridge(s)) (Candle(s))

(1) (2) (3) (4) (5) (6) Insect Repellent Pad(s) (Pad(s))

Net Weight: ____ oz. (____g) each

Total Net Weight: ____ oz. (____g)

(REFILL(S))

(REFILL PACKAGE) (CONTAINS) (CONTENTS):

(1) (2) (3) (4) (5) (6) (Fuel Cartridge(s)) (Candle(s))

(1) (2) (3) (4) (5) (6) Insect Repellent Pad(s) (Pad(s))

Net Weight: ____ oz. (____g) each

Total Net Weight: ____ oz. (____g)

(Contains Bitrex™ (Ingestion deterrent).)

(New!)

(Area Repellent)

((Continuous) (Comforting) (Soothing) (Peaceful) protection (from mosquitoes) (bugs) (outdoor flying insects) (biting flies))

(Freedom to) (Enjoy (the outdoors) (your backyard) (again))

ACCEPTED
WITH COMMENTS
In EPA Letter Dated:
DEC 21 1999
Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
4822-469

((Enjoy the) Soothing glow)
 (The ultimate bug (mosquito) protection.)
 (Create the perfect ambiance)
 (Light up your (deck) (patio) (night))
 ((Great) (Ideal) (Perfect) for (parties) (gatherings) (entertaining) (gardening))
 (Create a relaxing ambiance)
 (Set the mood)
 (Create a Virtually Bug-Free Zone™)
 (Keep Bugs OFF!®, while you light up your night)
 ((An) (The) OFF!®, you don't put on™)
 (Light up your night, while you keep bugs OFF!®)
 (A decorative way to keep (bugs) (mosquitoes) (outdoor flying insects) OFF!® the guest list)
 (Ambiance and (efficacy) (effectiveness) (an effective repellent) in one product)
 ((The new) (OFF!® Repellent LMO) forms a protective barrier from mosquitoes.)
 (Create (a) (an) (wonderful) (pleasant) (nice) (atmosphere) (that) (you) (your family) (and) (you) (your friends) (will love) (enjoy) (but the bugs) (will hate) (won't).)
 (New OFF!® (Repellent LMO) (area repellent) creates a (wonderful) (nice) (festive) (enjoyable) (pleasant) (atmosphere) (ambiance) like citronella candles and tiki torches, but protects further than a candle or torch.)
 (Give your evening outside a special touch while making sure the bugs won't touch you.)
 (OFF!® (repellent) protection that glows)
 (Its portable design also makes it great for camping.)
 (New OFF!® (Repellent LMO) (area repellent), doesn't have an exposed flame so you don't have to worry about (your kids) (children) (getting burned) (burning their fingers) (putting their hands where they shouldn't).)
 (The flame (inside) extinguishes (automatically) (immediately) if it is tipped over.)
 ((OFF!® Repellent LMO) (The device) is specially designed so it can not tip over easily.)
 (Repellent LMO) (It) is (a product) (device) (lamp) (unit) (something) you can feel good about using around your (family) (kids) (children) (and friends).)
 ((When used with Repellent LMO pads,) (Repellent LMO) (efficiently) repels (reduces the annoyance of) (mosquitoes)(outdoor flying insects) (bugs) ((and) biting flies) in an area as large as (15 feet in diameter) (an average-size deck or patio) (15 feet by 15 feet) (175 square feet) (225 square feet) (a deck or patio) (for hours).)
 (Repellent LMO is also portable to allow you to take it anywhere you expect annoying (mosquitoes) (outdoor flying insects) (bugs)((and) biting flies) to be a problem.)

((Provides) (Odor-free) (Unscented) (Scented) (Pleasantly scented) (Convenient) (Portable) (Silent) (Continuous) (No-mess) (Worry-free) (Effective) protection (for up to 4 hours).)

((Provides) (Odor-free) (Unscented) (Scented) (Pleasantly scented) (Convenient) (Portable) (Silent) (Continuous) (No-mess) (Worry-free) (Effective) protection from (mosquitoes) (outdoor flying insects) (bugs) (biting flies).)

((Provides) (Odor-free) (Unscented) (Scented) (Pleasantly scented) (Convenient) (Portable) (Silent) (Continuous) (No-mess) (Worry-free) (Effective) protection you can take anywhere outdoors.)

((Provides) (Odor-free) (Unscented) (Scented) (Pleasantly scented) (Convenient) (Portable) (Silent) (Continuous) (No-mess) (Worry-free) (Effective) protection you don't (have to) put on.)

(A revolutionary device that protects (you) (and) (your) (family) (guests) (and) (friends) from (mosquitoes) (outdoor flying insects) (bugs) (biting flies).)

(A device that (pleasantly protects your outdoor area from (mosquitoes) (outdoor flying insects) (bugs) (biting flies)) (provides protection from mosquitoes (outdoor flying insects) (bugs) (biting flies)).)

(An outdoor product for use in backyards, patios, decks, and other recreational areas)

(But now the makers of OFF!®, the experts at keeping (mosquitoes) (bugs) (outdoor flying insects) (biting flies) away, has developed a whole new way to give you effective protection. In fact, it's an OFF!® product you don't put on.)

(Made from a (tough) (sturdy) (durable) (material) (that can be) (easily) (wiped off) (cleaned))

(Just use (the device) once and throw away.)

(Throw away (the device) when pad and candle are (exhausted) (used up).)

(Don't forget to pick up (Repellent LMO) (fuel) (cartridges) (candles) (and) (pads) (refills).)

(Make sure you have enough (Repellent LMO) to (properly) protect (your outdoor area) (backyard) (deck) (patio). Just see the (chart) (graphic) (below) to figure out how many you need.)

(Weather-resistant)

(Sturdy)

(Durable)

(Worry-free)

(No-mess)

(Safe (and effective) when used as directed)

(Continuous)

(Convenient)

(Easy to use)

(Effective)

(Enjoy the outdoors again (With the OFF!® you don't put on) (without wearing an insect repellent).)

((Repellent LMO) is (perfect) (just right) for (holiday parties) (outdoor get-togethers) (dinners with the family).)

(Just place them in (and) (or) around the area you want to protect.)

(Take your backyard back from the bugs.)

(Make outdoor evenings enjoyable again.)

(Odor-free)

(One (OFF!®) (Repellent LMO) (Fuel) (cartridge) (candle) lasts (4) (6-8) (8) (8-10) (9) (9-10) (10) (10-11) (11) (10-12) (12) (up to 4) (up to 24) hours.)

(One Repellent LMO pad lasts (2) (2-3) (3) (3-4) (2-4) (4) (up to 4) hours.)

(Plus it's portable. So you can take it anywhere (mosquitoes) ((and) biting flies) are expected to be a problem.)

(Portable)

(Long lasting device)

(Easy to clean)

(Easy to store from season to season)

(Provides up to 4 hours of (Odor-free) (pleasant smelling) (unscented) (scented) (pleasantly scented) (Convenient) (Portable) (Silent) (Continuous) (Effective) protection from mosquitoes (outdoor flying insects) (bugs) (biting flies).)

(Revolutionary)

(Security from (mosquitoes) (outdoor flying insects) (bugs) (biting flies).)

(Security system against (mosquitoes) (outdoor flying insects) (bugs) (biting flies).)

(Silent)

(Simple)

(Take back (reclaim) your (backyard) (patio) (deck) from (mosquitoes) (outdoor flying insects) (bugs) (biting flies).)

(The (odor-free) (convenient) (portable) (silent) (continuous) (effective) way to keep your area bug-free.)

(The OFF!® (repellent) you don't put on!™)

(Unobtrusive)

(Each (Repellent LMO) (refill) candle and pad lasts up to four hours)

[(Usage Tips) (Helpful Hints)]

(For best results,) (To clear mosquitoes from underneath the table) (place at ground level for (a few) (5) (10) (10-15) (15) (15-30) (30) minutes).

(Place the (unit) (device) (lamp) (unit) (Repellent LMO) at ground level to reduce ankle/leg bites.)

(For best results,) (Allow (a few) (5) (10) (10-15) (15) (15-30) (30) minutes for product to take effect.) (Light) (Activate) (turn on) the (product) (Repellent LMO) (OFF!® Repellent LMO) (outdoors) (at least) (5) (10) (10-15) (15) (15-30) (30) minutes before your activity (and place it in your outdoor area) (so it has time to begin working.)

(Use the Repellent LMO) (when air is calm) (in still air) (in areas) (The device works well in outdoor areas) (where there is minimal (light) (mild) (breeze)) (such as decks, porches, patios, yards).)

(Wind will carry (disperse) (distribute) the repellent away from the device.)

(Use one Repellent LMO (in) (small areas) (an area as large as) (10x10) (11x11) (12x12) 13'x13') (14'x14') (15' by 15') (15 feet in diameter) (an average size deck or patio) (175 square feet) (225 square feet) (a deck or patio) (for every 175 square feet) (for every 225 square feet) (of space).)

(Use two Repellent LMO (or more) (in) (larger areas) (areas larger than) (15 feet in diameter) (an average size deck or patio) (15 feet by 15 feet) (175 square feet) (225 square feet) (a deck or patio) (for every 175 square feet) (for every 225 square feet) (of space).)

(Place units at intervals of (10) (15) (20) (30) (40) feet.)

(Extreme) wind, heat, humidity may effect the performance of the Repellent LMO.

(Device and pad effectiveness may be diminished if exposed to rain.)

(If your unit fails to light (activate), it may be out of fuel.)

(Check (the) fuel level by holding the cartridge horizontally and looking at the clear end.)

(Check (the) fuel gauge on the (back of the device) (bottom).)

(You can see (the) amount of fuel in (the) cartridge. Replace (the) (candle if it has (been exhausted) (burned out)) (cartridge if it is empty).)

(When (the) candle (burns out) (is exhausted) (the) pad is (used up) (exhausted).)

(The candle and the pad are especially designed to work together for 2) (2-3) (3) (3-4) (2-4) (4) (up to 4) hours.)

[(Usage Tips) (Helpful Hints) cont...]

(Always replace the pad when the candle is used-up.)

(Pad (pad) turns (white) (pale blue) (beige) (brown) when active ingredient has been exhausted) (used up).)

(As with all lit (wax candles) (oil products), use caution if moving is required).
(Take caution) (Be careful) when moving lit, activated unit (device) (lamp).)

(Contains Bitrex™ (Ingestion deterrent).)

(Do not attempt to remove the plastic pole in the base.) (The plastic pole in the base ensures that the candle (cup) (holder) fits into the right position).

DIRECTIONS FOR USE

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

[BASIC INSTRUCTIONS]

Place (the) (device) (lamp) (unit) (Repellent LMO) on a flat, stable area (near to where you want to enjoy the outdoors) (without the constant annoyance from (mosquitoes) (bugs) (flying, biting bugs) (insects)).

(Remove sticker(s) from (lens) (device top)).

(Open) (Remove) (Slide) device (top) (lens) (bottom).

(Remove the enclosed (contents) (and) (cardboard) (paper) (sleeve)).

(Snap) (Place) (Screw) (fuel canister) (candle) into base. (Make sure candle is sitting flat on the base.)

Remove one (Repellent LMO) (repellent) pad from its (the) (package) (wrapper) (cover). Place it (in the device top) (in the top of the unit) (in the (pad) holder) (in the device top's slot). (Do not remove plastic (housing) (cage) (encasement) (cover)). (Do not force the pad).

Light the (fuel wick) (candle) (wick).

Reinstall device top (lens) (bottom) (being careful to (turn) (twist) top until it (snaps) (clicks) (locks) (fits) in (into) place) (it snaps into place).

(As with all lit (wax candles) (oil products), use caution if moving is required).

(Take caution) (Be careful) when moving lit, activated unit (device) (lamp).)

When (you are) finished using (the) (device) (lamp) (unit) (Repellent LMO), carefully remove top and blow out flame.

TO CHANGE PAD AND CANDLE (pad and candle should be changed at the same time (simultaneously)):

(The candle and the pad are especially designed to work together for (2) (2-3) (3) (3-4) (2-4) (4) (up to 4) hours.)

(Ensure that the flame is extinguished before changing the pad). (Extinguish flame.)

Allow (the) (Repellent LMO) (device) (lamp) (unit) to cool completely.

(Open) (Remove) (Slide) device (top) (bottom).

(Open up device.)

Pull (the) used pad out and slide (in) (a) fresh pad (in). (Do not force the pad). (Wrap (the) used pad in paper and place (it) in (the) trash.)

IMPORTANT: Remove (plastic) candle (cup) (container) and insert a new (refill candle) (cup containing a (fresh) (new) candle).

Light the (fuel wick) (candle) (wick).

Reinstall device top (being careful to (turn) (twist) top until it (snaps) (locks) (fits) (clicks) in (into) place) (it snaps into place).

STORAGE: Store unused pads in (original packaging) (the device storage area) (and in) (an area inaccessible to children and pets) (and keep in locked area). (After allowing to cool,) Store (device) (lamp) (unit) (Repellent LMO) and (with its partially used pads) in a cool, dry place inaccessible to children and pets.

DISPOSAL: Securely wrap (exhausted) (used up) pad in newspaper and place in trash. After allowing to cool, securely wrap empty fuel cartridge in newspaper and place in trash.

[NOTE TO REVIEWER: THE DIRECTIONS FOR USE WILL VARY DEPENDING ON THE SPECIFIC DESIGN OF THE DELIVERY SYSTEM. THE FOLLOWING ALTERNATE DIRECTIONS MAY BE ADDED TO (OR COULD REPLACE PORTIONS OF) THE BASIC INSTRUCTIONS TO ACCOMMODATE POTENTIAL CONFIGURATIONS OF THE DEVICE.]

(Fold) (unfold) (assemble) (build) device as shown in picture.

(Remove protective rain cap.)

(Remove (base) (fuel (candle) compartment) cover to expose (fuel) (candle) compartment in base of unit.)

(Remove child resistant cap from fuel source.)

(Reinstall (base) (fuel (candle) compartment) cover.)

(Place candle on flat surface (near to where you want to enjoy the outdoors).)

(Place the device top on a flat surface covering the candle.)

(Close device.)

(When (you are) finished using (the) (device) (lamp) (unit) (Repellent LMO), simply blow through the side (vents) to extinguish the flame.)

(When (you are) finished using (the) (device) (lamp) (unit) (name) simply close (air) vents.)

(When surfaces are cool to the touch snap protective rain cap over the vented top to prevent rain water from getting into the device or wetting the (repellent) (pad) (pad).)

(Discard and replace pad when it turns (white) (pale blue) (beige) (brown).)

((Attach) (Secure) (the device) (the unit) (OFF!® Repellent LMO) to the (optional) pole and (place) (install)(put) the pole into the ground.)

((You can) Collapse (fold) (disassemble) (the device) (the unit) (OFF!® Repellent LMO) when not in use (for storage) (for use away from home) (for transportation).)

(Insert) (Secure) (Place) (Securely) pole into the ground (attach) (place) (install) (the device) (the unit) (OFF!® Repellent LMO).

(Make sure to extinguish the flame before collapsing (folding) (disassembling) the device (the unit).)

(Do not (walk with) (the device) (the unit) (OFF!® Repellent LMO) (lit) (functioning) (working).)

((OFF!® Repellent LMO) (This device) (is) not for use when walking.)

(Do not hang (device) (lamp) (the unit) (OFF!® Repellent LMO) higher than (4) (5) (6) (8) feet above the ground.)

Hang device only on optional OFF! Repellent LMO pole.

(Before cleaning, make sure to extinguish the flame and let (the device) (the lamp) (the unit) (top) (OFF!® Repellent LMO) cool.)

(Before cleaning, remove pad (and candle) (and fuel source) (first).)

(Wash with a wet cloth only.)

(Wash with water and light (duty) detergent.)

(Wipe with a dry (paper) towel.)

[NOTE TO REVIEWER: DIRECTIONS/INSTRUCTIONS MAY CONTAIN SUBTITLED PICTURES TO AID CONSUMER UNDERSTANDING]

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION. Harmful if swallowed or inhaled. Avoid breathing vapors. Keep out of reach of children. For outdoor use as an insect repellent only. Do not use indoors, in a tent or enclosed area. Do not touch the (vented top) (device) (unit) while (the lamp) (the unit) (it) is in use. The (vented top) (device) (lamp) (unit) is hot while in use. Do not insert (use) anything other than Repellent LMO (pads) (pads) (and candles) in the (device) (lamp) (unit). Wash hands thoroughly with soap and water after handling.

FIRST AID

If Swallowed: Call a physician or poison control center. Drink one or two glasses of water and induce vomiting by touching back of throat with finger. If person is unconscious, do not give anything by mouth and do not induce vomiting. If inhaled: Move victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. Get medical attention.

ENVIRONMENTAL HAZARDS

This pesticide is highly toxic to fish. Do not apply directly to water. Drift from treated areas may be hazardous to organisms in adjacent aquatic sites.

PHYSICAL AND CHEMICAL HAZARDS

Place on flat, stable surfaces. Do not cover with any material while in use. Clean with a damp cloth only when the device is cool and inactive.

(Keep candle wick trimmed to (1/2) (1/4) inch or less at all times. Keep candle free of matches or foreign matter that may present fire hazard.)

Do not insert anything other than Repellent LMO pads into the top. Do not allow pad to come into contact with other substances. S.C. Johnson & Son, Inc. will not be held responsible for damage, injury or poor performance caused by use of other fuel cartridges (candles) or repellent pads.

EPA Reg. No. 4822-469

EPA Est. No. 4822-WI-1

Patents Pending

QUESTIONS? COMMENTS? Call 800-558-5252 or write Helen Johnson. ©(1998)(1999)(2000) S.C. Johnson & Son, Inc., Racine, WI 53403-2236 USA. All Rights Reserved.

[REPELLENT PAD POUCH]

Repellent LMO

ACTIVE INGREDIENT

d-cis/trans aliethrin.....21.97%

INERT INGREDIENTS..... 78.03%

KEEP OUT OF REACH OF CHILDREN

CAUTION Harmful if Swallowed

(SEE (OUTER CARTON) (INSERT) FOR ADDITIONAL PRECAUTIONARY STATEMENTS)

(FOR DETAILED DIRECTIONS FOR USE AND SAFETY INFORMATION, SEE INSERT (INSTRUCTION SHEET) INSIDE (CARTON) (BOX).)

Net Contents: ____ (pads)(pads)

Net Weight: ____ oz. (____g) each

Total Net weight: ____ oz. (____g)

EPA Reg. No. 4822-469

EPA Est. No. 4822-WI-1

QUESTIONS? COMMENTS? Call 800-558-5252 or write Helen Johnson. ©(1998)(1999)(2000) S.C. Johnson & Son, Inc., Racine, WI 53403-2236 USA.

All Rights Reserved

(Contains Bitrex™ (Ingestion deterrent).)

[DEVICE LABEL]

ATTENTION - HOT SURFACE

Keep out of reach of children.

For outdoor use as an insect repellent only. Do not use indoors, in a tent or enclosed area. Do not touch the device top while the unit is in use. Device top is hot while in use.

Place on flat, stable surfaces.

Do not cover with any material while in use.

(Device contains flammable fuel. Do not use near fire or flame.)

Read Directions for Use and precautionary statements on the (insert) (instruction sheet) and outer package carefully.

Fuel cartridges (candles) other than (OFF!® Repellent LMO) will not work in this device. S.C. Johnson & Son, Inc. will not be held responsible for damage, injury or poor performance caused by use of (other) fuel cartridges (candles) or repellent pads (other than Repellent LMO's).

Manufactured for S.C. Johnson & Son, Inc. Racine, WI 53403-2236, Patents Pending

(Do not remove repellent pad while the (device) (lamp) (unit) is in (use) (lit)).

[FUEL CARTRIDGE (if applicable)]

Repellent LMO (oil) (lamp) (cartridge) (canister) Harmful or fatal if swallowed. Combustible. Contains petroleum hydrocarbons. Do not take internally. If swallowed do not induce vomiting. Call a physician immediately. Remove wick cover with a coin or screwdriver. WARNING: Replace wick cover when not in use to prevent accidental ingestion of liquid by a child. Do not adjust wick height. KEEP OUT OF REACH OF CHILDREN. NEVER LEAVE A (FLAME) (DEVICE) (Repellent LMO) UNATTENDED. Do not store near heat or open flame. Do not use near flammable surfaces or items. Do not use in potpourri pots or any other container where there is inadequate ventilation above the flame. As with all open flame products, use with extreme care and at your own risk.

FOR OUTDOOR USE ONLY.

HARMFUL IF SWALLOWED.