

4822-469

9/15/2009

1 of 1



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

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

September 15, 2009

Ms. Jill C. Geyer,  
Registration Specialist  
S.C. Johnson & Son, Inc.  
1525 Howe Street  
Racine, WI 53403-2236

**Subject: Amended Labeling, Response to PR Notice 2007-4  
Repellent LMO, EPA Reg. No. 4822-469  
Your Submission Dated July 9, 2009**

Dear Ms. Geyer:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable with the following label provision(s):

Ingredient Statement section comment(s):

1. Replace the words "INERT INGREDIENTS" with the words "OTHER INGREDIENTS."
2. Revise the statement immediately following the ingredient statement to read: "CAUTION: See (side)(back) (bottom) panel(s) for additional precautionary statements."

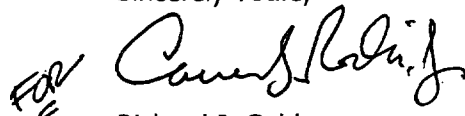
Should you wish to add/retain a reference to the company's website on your label, please be aware that the website becomes labeling under FIFRA and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under section 12(a)(1)(E) of FIFRA. 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 with Comments" is enclosed for your records. Please submit two (2) copies of the final printed labeling, incorporating the above changes, before releasing the product for shipment. If these conditions are not complied with, the registration will be subject to cancellation in accordance with section 6(e) of FIFRA. Your release for shipment of the product bearing amended labeling constitutes accepting of these conditions.

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If you have any questions about this label review, please contact Mr. Carmen J. Rodia, Jr. directly at (703) 306-0327 or via e-mail at [Rodia.Carmen@epa.gov](mailto:Rodia.Carmen@epa.gov).

Sincerely Yours,

Handwritten signature of Carmen J. Rodia, Jr. in black ink, written over a small rectangular stamp.

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

*Enclosure:* Copy of label stamped "Accepted with Comments"

004822-00469 D417048

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Labeling for the Outer Packaging for the Lamp, the Lantern, and the Refill Unit

Repellent LMO

ACTIVE INGREDIENT:

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

INERT INGREDIENTS ..... 78.03%

Keep out of reach of children.

CAUTION: For detailed use directions and safety information, see (side)(back)(bottom) panel(s).

NET WT.: XX oz.

S.C. Johnson A Family Company

CONTAINS:

- X Reusable Lamps
- X Mosquito Repellent Pads
- X Candles
- X Refills
- X Reusable Lanterns
- X Pole Segments

ACCEPTED  
 With COMMENTS  
 In EPA Letter Dated:  
*September 15, 2009*  
 Under the Federal Insecticide, Fungicide  
 and Rodenticide Act, As amended, for the  
 pesticide Registered under EPA Reg. No:  
4822-469

(Repellent LMO) Mosquito Repellent Pads (included)  
 Mosquito protection for areas up to 15 feet by 15 feet  
 Repels mosquitoes from an area up to 15 feet by 15 feet (225 SQ.FT.)  
 Candle creates a pleasant glow while warming repellent pad for effective mosquito protection (in an area as large as 15 feet by 15 feet)  
 Repellent LMO effectively repels mosquitoes from an average size patio for hours  
 Repels mosquitoes from an averaged size (deck)(patio)  
 Each pad provides (effective)(fragrance free) protection for up to 4 hours.  
 Each pad lasts up to 4 hours  
 Each candle and pad lasts up to 4 hours  
 Up to 4 hours of protection  
 No exposed flame when in use  
 Convenient  
 Easy to use  
 Easy to assemble  
 Portable  
 No tools required for assembly  
 pad technology repels mosquitoes!  
 Don't forget to purchase Repellent LMO refills  
 Works with Repellent LMO Refills

Also available Repellent LMO  
Sample inside  
Free refills  
Added refills inside  
Heat activated repellent pad  
Contains X PowerPad refills  
Patented PowerPad technology  
Not just a candle, contains a repellent pad  
It's in the pad  
The power to repel is in the pad  
Enclosed flame  
No scent  
Repels mosquitoes in the (woods)(outdoors)(great outdoors)(backyard)  
(park)(forest) for up to 4 hours  
OFF! Protection That Glows  
Repels mosquitoes that may carry West Nile Virus  
Stock up on Off! for the summer  
Off! for your next party  
Most trusted mosquito repellent  
America's favorite repellent  
Free  
Take back your backyard  
Contains no messy oil  
Stay out late with the product bugs hate  
Protection and ambiance  
Mosquito defense system  
Insects hate us people love us  
Great for (BBQs)(picnics)  
(Mosquito) Protection that you can enjoy  
Effective mosquito protection you don't have to put on  
This really works!  
Proven protection from mosquitoes  
Take the challenge  
A back yard necessity  
Perfect for parties  
Protect (your family)(the ones you love) from mosquitoes  
Party approved  
OFF! Defense  
Use with confidence  
Extends your (home)(outdoor) living area  
Enhances your outdoor experience  
Outdoor activity without annoying mosquitoes  
Maximize your outdoor experience  
Get ready for the summer  
(Family)(Camping)(Mosquito Protection) kit  
OFF! for every occasion

Entomologist developed  
 Free your family from (annoying) mosquitoes  
 Repels mosquitoes before they get you  
 OFF! is a complete line of mosquito protection for every situation  
 (Multi-Pack)(Twin)(Bonus)(Value)(Variety)(Backyard)(Barbeque)(Pack)  
 But One Get One Free  
 Keep bugs OFF! without anything on  
 Great protection with no mess  
 Great repellency no mess  
 The OFF! that you don't put on  
 Just light it and relax  
 Light up your night  
 Mosquito protection that lasts all evening  
 The original  
 Effective repellency against mosquitoes which may carry West Nile Virus

| Protection Chart                                 | OFF! ® PowerPad |
|--|-----------------|
| Uses heat activated repellent pad.               | ✓               |
| Repels mosquitoes from an area up to 225 SQ.FT.  | ✓               |
| Repels mosquitoes that may carry West Nile Virus | ✓               |
| Each pad lasts up to 4 hours                     | ✓               |

Helpful Hints

Protection is not immediate  
 Allow time for candle to heat (mosquito repellent) pad  
 High humidity may increase time before repellent is released  
 Pads are designed to release repellent when heated by candle  
 Pad color will change during use  
 Do not change pad until candle is used up  
 When candle is used-up and will not relight, replace both candle and pad  
 Expect a small amount of wax to remain in bottom of candle cup  
 Change candle and pad at same time  
**KEEP LEVEL**  
 To avoid fire hazard, do not place pads, matches or other foreign matter on or in candle cup  
 Use one (Repellent LMO) in an area as large as an average deck or patio  
 Use one (Repellent LMO) in an area as large as 15' by 15'  
 Use two or more (Repellent LMO) in larger areas  
 It is normal for the pad to emit some smoke when product is in use  
 Be sure to wash hands after handling  
 Contains Bitrex  
 Bitrex ® is a trademark of Macfarlan Smith, LTD.  
 (For maximum protection) place product upwind

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To clear mosquitoes from under table, place underneath (table) for a few minutes

Make sure pole is inserted securely and straight

Test to ensure pole does not tip easily

Do not use hammer to insert pole

If ground is too hard, use water to soften the ground

X-piece sectional pole included

Assembles to (approximately) X feet (high)

Gently slide narrow end of pad into slot in top of unit

### **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 only. Do not use indoors, in a tent or enclosed area. Attention, colored vent top is hot while in use. Be sure to wash hands after handling.

#### **First aid**

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

**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 inhaled:** Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.

#### **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**

*{Note: These physical and chemical hazards will be used when the product is sold as a lamp unit}*

Place on level, stable surfaces. Do not cover lamp top with any foreign material while in use. Before lighting candle make sure wick is trimmed to ¼ inch. To avoid fire hazard, do not place pads, matches or other foreign matter near candle flame. Never cut, bend or alter shape of pad. Pads may cause staining – avoid contact with other surfaces. Do not place Repellent LMO near combustible materials such as dry vegetation, clothing, or fuels. NEVER BURN CANDLE UNATTENDED. Failure to follow these instructions could result in personal injury or property damage. Do not use anything other than Repellent LMO pads and

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candles in lamp. To the fullest extent permitted by law S.C. Johnson & Son, Inc. shall not be liable for damage, injury or poor performance caused by the use of other pads and candles.

*{Note: These physical and chemical hazards will be used when the product is sold as a lantern unit.}*

Do not cover lantern top with any foreign material while in use. Before lighting candle make sure wick is trimmed to ¼ inch. To avoid fire hazard, do not place pads, matches or other foreign matter near candle flame. Never cut, bend or alter shape of pad. Do not move when lit. Use pole per instructions; do not use for any other purposes. Do not remove hanging lantern from pole. Make sure pole is inserted securely (and straight). Remove all pole segments from ground when not in use to minimize tripping hazard. **TEST TO ENSURE POLE DOES NOT TIP EASILY.** Do not place near underground wires or gas lines. Pads may cause staining – avoid contact with other surfaces. Do not place Repellent LMO near combustible materials such as dry vegetation, clothing, or fuels. **NEVER BURN CANDLE UNATTENDED.** Failure to follow these instructions could result in personal injury or property damage. Do not use anything other than Repellent LMO pads and candles in lamp. To the fullest extent permitted by law S.C. Johnson & Son, Inc. shall not be liable for damage, injury or poor performance caused by the use of other pads and candles.

*{Note: These physical and chemical hazards will be used when the product is sold as a refill unit}*

Do not cover unit top with any foreign material while in use. Before lighting candle make sure wick is trimmed to ¼ inch. To avoid fire hazard, do not place pads, matches or other foreign matter near candle flame. Never cut, bend or alter shape of pad. Pads may cause staining – avoid contact with other surfaces. Do not place Repellent LMO near combustible materials such as dry vegetation, clothing, or fuels. **NEVER BURN CANDLE UNATTENDED.** Failure to follow these instructions could result in personal injury or property damage. Do not use anything other than Repellent LMO pads and candles in lamp. To the fullest extent permitted by law S.C. Johnson & Son, Inc. shall not be liable for damage, injury or poor performance caused by the use of other pads and candles.

### **STORAGE AND DISPOSAL**

**STORAGE:** Prolonged storage of repellent pads in outdoor conditions may decrease effectiveness. Store unused pads in an area inaccessible to children and pets.

**DISPOSAL:** Before disposing, empty package by using the product according to the label. Used Pad **and Pad Pouch:** Place exhausted pad **or pad pouch** in trash or offer for recycling if available. Candle: After

allowing exhausted candle to cool, place cup in trash. **Do not reuse or refill cup.** Unused pads: Call your local solid waste agency or 1-800-529-3394 for disposal instructions. Never place unused product down any indoor or outdoor drain.

**Directions for Use:** It is a violation of federal law to use this product in a manner that is inconsistent with its labeling.

*{Note: These directions for use will be used when the product is sold as a lamp unit.}*

Locate lock tabs on unit base, press to release and lower frame. Remove enclosed contents. Firmly press candle cup onto base post. Light candle. Remove repellent pad from package being careful not to cut, bend, or alter pad shape. Insert OFF! PowerPad into middle slot on top. Raise frame base and snap into place. Move lamp only when cool and not in use. To avoid fire hazard, do not place pads matches or other foreign matter on or in candle cup. When finished using, carefully remove frame base and blow out candle. Pad is designed to last as long as candle.

To replace pad/candle combination:

When candle is used up and will not relight, replace both candle and pad. Remove lamp top. Make sure flame is extinguished and lamp is cool before changing pad. Pull out used pad and slide in new pad. Remove used candle cup and firmly press new candle cup with fresh candle onto base post. To avoid fire hazard, use only OFF! candles in lamp. Light candle. Raise frame base and snap into place. Avoid contamination of food.

*{Note: These directions for use will be used when the product is sold as a lantern unit.}*

Use connectors to assemble rods. Push pole into stable ground. Test to ensure pole does not tip easily. Locate lock tabs on unit base, press and release to lower frame. Remove enclosed contents. Firmly press candle cup onto base post. Light candle. Remove repellent pad from package being careful not to cut, bend, or alter pad shape. Insert OFF! PowerPad into middle slot on top. Raise frame base and snap into place. When finished using, carefully remove frame base and blow out flame. Pad is designed to last as long as candle. To avoid fire hazard, do not place pads, matches or other foreign matter on or in candle cup. Use one Repellent LMO in an area as large as 15' by 15'. Use two or more in larger areas. Allow time for candle to heat mosquito repellent pad. When candle is used up and will not relight, replace both candle and pad. Expect a small amount of wax to remain in bottom of candle cup. (Change candle and pad at same time.) Place product upwind for maximum protection.

To replace pad/candle combination:



When candle is used up and will not relight, replace both candle and pad. Lower lantern from base. Make sure flame is extinguished and lantern is cool before changing pad. Pull out used pad and slide in new pad. Wash hands. Remove used candle cup and firmly press new candle cup with fresh candle onto base post. To avoid fire hazard, use only OFF! candles in lantern. Light candle. Raise frame base and snap into place. Avoid contamination of food.

Cleaning Instructions:

Before cleaning lantern, extinguish flame and let lantern cool. Wash with a wet cloth only. Note: To avoid damaging product, be careful not to move or bend metal bar inside of lantern when cleaning. Be sure to wash hands after handling.

*{Note: These directions will be used when product is sold as a refill unit.}*

To replace pad/candle combination:

Pads are designed to release repellent when heated by candle. When candle is used up and will not relight, replace both candle and pad. Avoid contamination of food. Detach unit top from base. Make sure flame is extinguished and unit is cool before changing pad. Remove used pad from top of unit. Remove new repellent pad from packaging being careful not to cut, bend, or alter pad shape. Gently slide narrow end of pad into slot in top of unit. Important: Remove used candle cup and firmly press new candle cup with fresh candle onto base post. Light candle. Reattach unit-top and base. Do not place repellent pad or matches on or in candle cup.

EPA Reg. No. 4822-269

EPA Est. No. XXXX-XX (...) Lot number suffix (...) indicates appropriate establishment number.

US Pat. 6,337,080 & 6,663,838 & 6,503,459

Questions? Comments?

Call 800-558-5252 or write Helen Johnson

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Racine, WI 53403-2236 U.S.A.

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[www.moquitoes.com](http://www.moquitoes.com)

Pads made in Italy

Candles made in Canada.

Labeling for the Vent Top

Attention Hot Surface  
Slide Pad in Center Slot

Labeling for the Lamp Base

100411

KEEP OUT OF REACH OF CHILDREN

If pad is swallowed, call 1-800-558-5252. Do not use indoors, in a tent or enclosed area. Read Directions for Use and Precautionary Statements on outer package carefully. Use only OFF! pads and candles. NEVER BURN CANDLE UNATTENDED. Do not place near combustible materials such as dry vegetation, clothing or fuels. Place on a level, stable surface. Make sure pole is inserted securely. Do not remove hanging lantern from pole. Do not move when lit. **Do not reuse of refill except as described in the Directions For Use.** Manufactured for: S.C. Johnson & Son, Inc., Racine, WI 53403-2236: US PAT.: (XXX), patent pending.

Labeling for the Pad Pouch

OFF! Repellent Pad

OFF! PowerPad

KEEP OUT OF REACH OF CHILDREN

CAUTION

HARMFUL IF SWALLOWED OR INHALED

SEE OUTER CARTON FOR ADDITIONAL PRECAUTIONARY STATEMENTS

ACTIVE INGREDIENT:

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

INERT INGREDIENTS ..... 78.03%

Questions ? Comments ? Call 800-558-5252 or write Helen Johnson.

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Net Contents: 1 PAD Net Wt.: .057 oz.

S.C. Johnson, A Family Company

Bitrex ® is a trademark of Macfarlon Smith, LTD. Contains Bitrex. Be sure to wash hands after handling.

Labeling for the Insert

Be sure to wash hands after handling. Bitrex ® is a trademark of Macfarlon Smith, LTD. Remove this insert before using. Pads are designed to release repellent when heated by candle. Pad color will change during use. Do not change pad until candle is used up. When candle is used up and will not relight, replace both pad and candle.

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Expect a small amount of wax to remain in bottom of candle cup.  
Change candle and pad at same time.