



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

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

September 8, 2011

Stuart McArthur SC Johnson & Son, Inc. 1525 Howe Street Racine, WI 53403-2236

Subject:

Amended Reregistration Label

Product Name: Repellent LMO

EPA Registration Number: 4822-469

EPA Decision Number: 425060

#### Dear McArthur:

The Agency, in accordance with the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, has completed reviewing all of the information submitted with your application to support the reregistration of the above referenced product in connection with the **Allethrin** RED and has concluded that your submission is acceptable.

NOTE: This product is **not** being reregistered under sections 3(c)5 and 4(g) of FIFRA at this time.

Please note that, should you wish to add/retain a reference to the company's website on your label, 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.

Please note that the record for this product currently contains the Confidential Statements of Formulation (CSFs) listed below. Any previously dated CSFs are superseded.

- Basic CSF, dated 4/7/2011
- Alternate CSF #1, dated 4/7/2011
- Alternate CSF #2, dated 4/7/2011

A copy of your label stamped "Accepted" is enclosed along with copies of the acute toxicity and

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product chemistry reviews completed for the subject product. Products shipped after 12 months from the date of this amendment or the next printing of the label whichever occurs first, must bear the new revised label. Your release for shipment of the product bearing the amended label constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e).

If you have any questions about this letter, please contact either Linda Arrington at (703) 305 6249 or via e-mail at <u>Arrington Linda@epa.gov</u>.

Sincerely yours,

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

Enclosures: Label stamped "Accepted," dated 9/8/2011

Acute Toxicity Review, dated 9/10/2010 Product Chemistry Review, dated 5/10/2011

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

# Repellent LMO

**ACTIVE INGREDIENT:** d-cis/trans allethrin .....

21.97%

OTHER INGREDIENTS ...... 78.03%

Keep out of reach of children.

ACCEPTED SEP 0 & 2011

Under the Federal insecticide, Fungicide, and Rodenticide Act. as amended, for the pesticide Registered under EPA Reg. No. US

CAUTION: See (side)(back)(bottom) panel(s) for additional precautionary statements.

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

(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

Heated pad releases repellent (up to 4 hours per pad)(up to 15 X 15 ft.)

(Up to 4 hours per pad)(Up to 15 X 15 ft.) protection

No exposed flame when in use

Convenient

Easy to use

Easy to assemble

Portable

No tools required for assembly

Pad technology repels mosquitoes!

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Don't forget to purchase Repellent LMO refills

Works with Repellent LMO (Refills)

Also available Repellent LMO

Sample inside

Free refills

Refills available

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

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

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(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)

Buy 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

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	<b>~</b>
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

To clear mosquitoes from under table, place underneath (table) for a few minutes Make sure pole is inserted securely and straight

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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

Patio & Deck

[Note to reviewer: Following is text from a matrix describing the segmentation of the OFF! line.]

Try our complete line of OFF! outdoor products.

PERSONAL repellents

**TABLETOP** 

PATIO & DECK

BACKYARD

[picture of person]

[table on deck picture]

[deck picture] [backyard picture]

Look for products in each of these categories to meet your outdoor needs

## **Precautionary Statements**

Hazards to humans and domestic animals

Caution: Harmful if swallowed. Harmful if absorbed through the skin. Avoid contact with skin, eyes or clothing. Causes moderate eye irritation. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

#### First aid

Call a poison control center or doctor immediately for treatment advice.

If swallowed: 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 On Skin or Clothing: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15 - 20 minutes.

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.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-558-5252 for emergency medical 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 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.

For outdoor use only. Do not use indoors, in a tent or enclosed area. Attention, colored vent top is hot while in use.

{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. 4822-469
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
Sold by: ©2009 S.C. Johnson & Son, Inc.,
Racine, WI 53403-2236 U.S.A.
All Rights Reserved
www.off.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

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#### 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, *On Skin or Clothing, or in Eyes.*SEE OUTER CARTON FOR ADDITIONAL PRECAUTIONARY STATEMENTS

#### ACTIVE INGREDIENT:

d-cis/trans allethrin	21.97%
OTHER INGREDIENTS	78.03%
Total	.100.00%

Questions? Comments? Call 800-558-5252 or write Helen Johnson. Sold by: ©2009 S.C. Johnson & Son, Inc., Racine, WI 53403-2236 U.S.A. All rights reserved. Made in Italy. EPA Reg. No. 4822-469. EPA Est. No. 43917-ITA-1 (A) or 082569-ITA-001 (B). Lot number suffix A or B indicated appropriate establishment number.

Net Contents: 1 PAD Net Wt.: .057 oz.
S.C. Johnson, A Family Company
(A Family Company Since 1886. Fisk Johnson [signature])

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,

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