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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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JAN - 3 2007

Ms. Amy Plato Roberts
Regulatory Consultant for Biosensory
Technology Sciences Group, Inc.
1150 18th Street, NW, Suite 1000
Washington, DC 20036

**SUBJECT: Biosensory's Dragonfly Octenol Lure; EPA Registration No. 70909-3;
Review of: 1) Octenol Release Testing (MRID 469336-01) in support of the product registration and use of an alternate size lure, and 2) Amended Label;
Your Transmittal Letter dated: September 14, 2006.**

Dear Ms. Roberts:

The Agency reviewed the data package and label referred to above. The data as submitted support, under the stated test conditions, the product's label claim to replace the cartridge every 30 days. However, additional concerns for the release rates of octenol from the alternate, smaller, lure are addressed below.

Label:

The label amendment referred to above, submitted in connection with registration under FIFRA section 3(c)(5), is acceptable provided that you:

1. Submit and/or cite all data required for registration/reregistration of your product under FIFRA section 3(c)(5) when the Agency requires all registrants of similar products to submit such data.
2. Submit five (5) copies of your final printed labeling before you release the product for shipment. Final printed labeling means the label or labeling of the product when distributed or sold. Clearly legible reproductions or photo reductions will be accepted for unusual labels, such as those silk-screened directly onto glass or metal containers or large bags or drum labels.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

Product Performance Data Related to Octenol Release from Lure:

The Agency agrees that the release of the octenol from the lure with 0.735 gram octenol, as tested, is sufficient to warrant a label claim indicating the product lasts 30 days in a temperature range with an average temperature of 74.6 °F.

CONCURRENCES							
SYMBOL	751P						
SURNAME	Petersen						
DATE	11/29/06						

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However, the data generated during the study, at the temperatures as reported (MRID 469366-01), are insufficient to represent use of the product in higher temperature ranges during summer conditions.

The Agency concludes the study as submitted is **supplemental** and **must be upgraded** with an additional test of the product, using the same method, at a higher average temperature to better represent the use conditions for the product. In addition, please provide information to address the following issues:

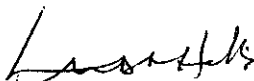
1. Your submission does not include daytime temperature data in relation to the location where lure will be placed inside or on a Kaz Stinger product. For example, what temperatures do the lures experience when a Stinger device is exposed in direct sunlight? How well will the lure perform when daytime temperatures reach 90 °F or higher?
2. There is no indication in which of the Stinger products the lure will be used or where the lure will be attached to such device.
3. There are no data to indicate if the lamp used in the Stinger devices creates heat (in daytime or night conditions) and potentially facilitates release of octenol.

The current report indicates that after 2300 hours of use there is about 50% of the octenol remaining in the lure. The Agency is unable to determine to what extent the remaining octenol is able to support the label claim of 30 days when the temperature range is higher than the test conditions in your study. At higher temperatures, this remaining amount may be released to the point that the claim would need to be reduced to fewer than 30 days time.

Because of the amount of octenol that remains in the lures at the conclusion of the 2300 hour test period, the Agency requests that you submit **within one year from the date of this letter a confirmatory study** demonstrating product performance at higher temperatures. Upon review of these confirmatory data, the Agency will consider approval of the continued use of the 30 day claim.

Please contact Dr. Todd Peterson, at 703-308-7224, if you have any questions concerning this application.

Sincerely,



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

Enclosure

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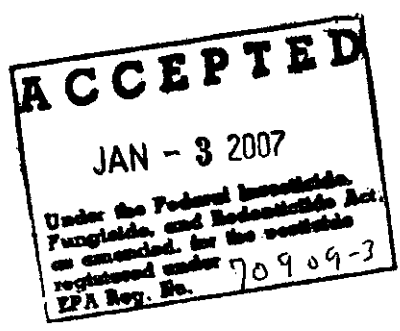
Dragonfly® Octenol Lure

Master Label includes:

- Main label
- Optional label claims
- Label text specific to supplemental distributors

EPA Reg. No.: 70909-3

Manufactured by:
BioSensory™ Inc.
Windham Mills Technology Center
322 Main Street, Willimantic, CT 06226-3149



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Dragonfly® Octenol Lure

Active Ingredient:

1-Octen-3-ol*..... 24.5%

Other Ingredients:..... 75.5%

Total: 100.00%

*Contains (3.72 grams) (.735 grams) Octenol per lure (strip).

Keep Out of Reach of Children

CAUTION

(See First Aid and (additional) precautionary statements on (back panel) (side panel) (insert label) (enclosed instructions)).

EPA Reg. No.: 70909-3

EPA Est. No.: XXXXX

Net Contents: XX oz. (XX grams). (Contains 1 lure. – for 0.753 g lure). (Contains (1) (2) lures – for 3.72 g lure.)

EPA Reg. No.: 70909-3

EPA Est. No.: XXXXX-XX-XX

Manufactured by:

BioSensory™ Inc.

Windham Mills Technology Center

322 Main Street, Willimantic, CT 06226-3149

(BioSensory, Dragonfly, Mosquito 'Cognito, and Conceal are registered trademarks of BioSensory™ Inc.

Protected by U.S. Patent Numbers 5,205,064; 5,799,436; 6,055,766 and 6,362,235. U.S. and International Patents Pending.)

Dragonfly® Octenol Lure, EPA Reg. No. 70909-3

Label amendment (B68) to add smaller sized lure, minor text additions and label claims

Master Label (24) dated November 21, 2006

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(Front panel) (Back panel) (Side panel) (Insert label)

FIRST AID	
If on skin or clothing	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15 – 20 minutes. • Call a poison control center or doctor for treatment advice.
If in eyes	<ul style="list-style-type: none"> • 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.
If inhaled	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. • Call a poison control center or doctor for further treatment advice.
If swallowed	<ul style="list-style-type: none"> • Call 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 the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
<p>Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For information on this pesticide product (including health concerns, medical emergencies or pesticide incidents), call the National Pesticide Information Center at 1-800-858-7378.</p>	

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

Caution: Harmful if swallowed. Wash hands before eating, drinking, chewing gum, using tobacco or using bathroom facilities. Avoid contact of areas under foil wrapper with skin and eyes.

DIRECTIONS FOR USE

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

To install or replace the Dragonfly® Octenol Lure:

Disconnect the power supply and remove the bottom cover of the Dragonfly® Electronic Biting Insect Trap. Remove the Octenol Lure by unscrewing the hold-down screw and pulling the lure out of its slot. Open the foil bag and insert the replacement Octenol Lure through one of the two slots in the bottom of the unit. The Octenol Lure is asymmetrical and will insert in only one direction so that it is always properly positioned. Replace the hold-down screw. Replace the bottom cover of the Dragonfly® Electronic Biting Insect Trap, connect the power, and turn the unit on. In everyday use, the Octenol Lure will last 60 days.

(Optional Text: Using the plastic twist tie from the Trap Body cord, thread one end through the hole on the top of the cartridge and tightly tie to the power cord at 3 inches from the top of the cord. Replace lure every 30-60 days depending on ambient temperatures.)

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Storage and Disposal

Cartridge Storage: Store this product in a cool, dry place out of the reach of children until ready to use.

Cartridge Disposal: Do not reuse attractant lure. Dispose of used attractant lure in the trash.

Warranty and Disclaimer: BioSensory, Inc. makes no warranty of merchantability, fitness for any particular purpose or otherwise, express or implied, concerning this product or its uses which extend beyond the use of the product under normal conditions in accordance with the statements made on this label.

(Label text on individual lures (product name) (refill))

(Product Name)

Keep Out of Reach of Children

CAUTION

(Follow label instructions)

(See outer packaging for other Precautionary Statements.)

(Active Ingredient: Octenol 24.5%)

EPA Reg. No. 70909-3

(EPA Est. No. XXXXX-XX-XXX)

(Manufactured by: Biosensory Inc.)

Dragonfly® Octenol Lure, EPA Reg. No. 70909-3

Label amendment (B68) to add smaller sized lure, minor text additions and label claims

Master Label (24) dated November 21, 2006

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Optional label claims

- The Dragonfly System.
- Made in the USA.
- For outdoor use only.
- Attracts certain mosquitoes and other biting flies.
- (Replacement lure) (product name) for the (Dragonfly® Electronic Biting Insect Trap System) (device name).
- Octenol lures biting insects to trap, away from you and your family.
- Octenol attracts mosquitoes, including those which may transmit (carry) West Nile virus (encephalitis) (diseases), (to the (pesticide device brand name) where they dehydrate (and die)).
- Mosquitoes may transmit West Nile virus and other viruses that cause encephalitis. They may also transmit heartworm disease to dogs and cats. Octenol attracts mosquitoes to the (pesticide device brand name) where they are killed.
- Octenol attracts mosquitoes, including those which may transmit heartworm disease to dogs and cats.
- Mosquitoes are not only a nuisance, they may transmit diseases that are a serious health threat to people and pets.

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Label text specific to Supplemental Distributor EPA Co. No. 69469 (Coleman, Inc.). For 3.72 gram lure only.

(Directions for Use)

(Option 1)

- Open lid of device. Remove from foil package. Install lure into unit. In everyday use the (product name) will last 30 days.

(Option 2)

- Open lure door by turning latch counter-clockwise. Open lure door.
- Remove (product name) from package.
- Install lure into track.
- Close lure door. Secure by turning latch clockwise until it stops.

(Optional Label Claims)

- For use anywhere outdoors-backyard, fishing, camping, campsite.
- Easy to install refill lure.
- Patented design, long-lasting Octenol lure attracts mosquitoes.
- Patented design lure refill provides consistent performance throughout the month.
- Attracts mosquitoes to the trap.
- Octenol attractant produces the scent that lures mosquitoes away from you.
- No zapping; no lotions; no sprays; no electrical cords.

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**Label text specific to Supplemental Distributor EPA Co. No. 74538
(Applika Consumer Products, Inc.). For 3.72 gram lure only.**

(Directions for Use)

- To install or replace the (product name):
 - 1) Pull the Latch up to unlock the Handles.
 - 2) Slide your hand under BOTH Handles and LIFT UP (A), then use both hands to separate the Handles and lower the Frame down (B).
 - 3) Lift the Resonator Cap off the column and set it aside. Remove the (product name) from its pouch and be careful not to touch the exposed holes on its surface. Slip the hook through the hole at the top of the (product name). Hang (product name) from one of the notches at the top of the column (C). (Product name) should be effective for up to 30 days.

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Label text specific to Supplemental Distributor EPA Co. No. 74939 (Blue Rhino Consumer Products, LLC). For 3.72 gram lure only.

(Directions for Use)

To ensure maximum performance and to lengthen the life of your (device name), perform these steps each time your cylinder is empty:

1. Turn valve on propane cylinder OFF.
2. Disconnect gas line from cylinder by turning knob counterclockwise.
3. Remove empty cylinder, replace with full cylinder.
4. Reconnect gas line to cylinder by turning knob clockwise.
5. Remove cylinder cover from empty cylinder and place on full cylinder.
6. Remove WaveTrap, empty and slide back in place.
7. Remove lid from top of (device name).
8. Remove used TacTrap and properly dispose.
9. Slide fresh TacTrap in place and remove protective paper.
10. *Remove used lure and properly dispose.
11. Remove fresh lure from package. Dispose of packaging properly.
12. Place lure into well.
13. Set Fine Tune ring to desired setting.
14. Check engine and gas lines for any sign of damage or missing parts. Repair any problems before attempting to start.
15. To start – turn propane cylinder ON and immediately press igniter button.
16. Once started, securely attach lid on device.
17. Wash hands with soap and water.

* Note – lure lasts at least 60 days.

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**Label text specific to Supplemental Distributor EPA Co. No. 74943
(Envirosafe Technologies NZ Ltd.). For 3.72 gram lure only.**

(Directions for Use)

To Install or replace the (product name):

1. Ensure the power to your (device name) is disconnected.
2. Remove the (product name) from its pouch and be careful not to touch the exposed holes on its surface.
3. Place the strip in one of the slots in the base of the trap and then reconnect the power. (Product name) should be effective for up to 30 days depending on weather conditions.

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Label text specific to product produced for Lentek, a Division of Koolatron Inc. For 3.72 gram lure only.

(Directions for Use)

To Install or replace the (product name):

Using the plastic twist tie from the Trap Body cord, thread one end through the hole on top of the cartridge and tightly tie to the power cord at 3 inches from the top of the cord. Replace lure every 30 – 60 days depending on ambient temperature.

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Label text specific to Supplemental Distributor EPA Co. No. 75508 (Intermatic, Inc.). For 3.72 gram lure only.

(Follow label instructions.) (See outer packaging for other Precautionary Statements.)

(Directions for Use – outer packaging)

Installation Instructions:

1. Open door on side of trap.
2. Remove lure from trap and discard in trash.
3. Install new lure in trap and close door.

Detailed directions for use enclosed.

(Directions for Use – insert label)

To install or replace the octenol lure:

1. Turn the (product name) OFF.
2. Open the door of (product name), remove the octenol lure from the hook on the inside of the door.
3. Open the foil bag and hang the replacement octenol lure on the hook inside of the door, close the door shut. Turn the (product name) ON.
4. Dispose of used octenol lure in trash.
5. Wash hands to remove any residue.

Replace octenol lure every 30 days.

(Illustration) (Press tab lightly and pull door forward.)
(Illustration) (Lower door and remove lure.)

(Optional Label Claims)

- 2 month supply of mosquito attractant lures.
- For use with (product name).
- Replace lure every 30 days.

Label text specific to Supplemental Distributor EPA Co. No. 72336 (Kaz, Inc.). For 0.735g lure only.

(Directions for Use – outer packaging)

1. Peel foil cover and snap (holed side down) into the built-in holder at the bottom of the (device name).
2. For other bug zappers or mosquito traps, place the lure in the small cassette provided and attach to the other enclosure.
3. Replace lure after 30 days.

(Optional Label Claims)

- Mosquito octenol lure.
- Lures mosquitoes and biting insects.
- The (product name) by Stinger helps lure more mosquitoes and biting flies.
- Lures more mosquitoes.
- Slow-release – lasts 30 days.
- Easy to attach.
- Mosquitoes are not only a nuisance; they may transmit diseases that are a serious health threat to people and pets.
- Octenol attracts mosquitoes, including those which may transmit West Nile Virus, encephalitis and other diseases to Stinger Insect Killers where they are killed by its powerful killing grid.
- (Product name) is designed to release octenol continuously for 30 days.
- Simply insert this special lure into base of the unit and mosquitoes are drawn deep into the killing grid.

Dragonfly® Octenol Lure, EPA Reg. No. 70909-3

Label amendment (B68) to add smaller sized lure, minor text additions and label claims

Master Label (24) dated November 21, 2006

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