

71910-3

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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

March 10, 2010

Ms. Kim Davis, CC, APC, Manager
Consultant/Agent for
The Schawbel Corporation
c/o RegWest Company, LLC
30856 Rocky Road
Greeley, CO 80631-9375

**Subject: Amended Labeling, Addition of Graphics/Marketing Language
ThermaCELL[®] Mosquito Repellent with Earth Scent, EPA Reg. No. 71910-3
Your Submission Dated December 16, 2009**

Dear Ms. Davis:

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 revision provision(s):

First Aid Statement comment(s), page 3 of 9:

1. You should incorporate the following statement as a 2nd sentence, immediately following the existing "HOT LINE NUMBER" statement, within the First Aid Statement (table): "For additional information on this pesticide product (including health concerns, medical emergencies or pesticide incidents), you may call 1-800-xxx-xxxx twenty-four (24) hours per day, seven (7) days per week." ¹

First Aid Statement comment(s), page 6 of 9:

2. You should incorporate the following statement as a 2nd sentence, immediately following the existing "HOT LINE NUMBER" statement, within the First Aid Statement (table): "For additional information on this pesticide product (including health concerns, medical emergencies or pesticide incidents), you may call 1-800-xxx-xxxx twenty-four (24) hours per day, seven (7) days per week."

Marketing Text (for use on boxes) comment(s), page 7 of 9:

3. Delete the newly inserted 1st, 12th and 13th marketing statements since they are vague and misleading to the consumer.

Marketing Text (Repellency-Related) comment(s), page 7 of 9:

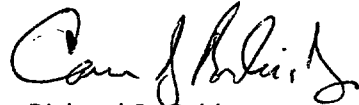
4. Within the 11th (revised) marketing statement, you must clarify that the "campsite" use is not intended for indoor use, or delete this revised marketing statement.

¹ Please note that the "1-800-xxx-xxxx" phone number must be substituted with a valid phone number that is available twenty-four (24) hours per day, seven (7) days per week for answering and responding to any medical emergencies or health concerns.

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.

In addition, you must contact the Agency's ITRMD directly and inform them about the address change that you have incorporated into this label on behalf of The Schawbel Corporation. If you have any questions regarding this label review, please feel free to contact me at (703) 306-0327 or via e-mail at Rodia.Carmen@epa.gov.

Sincerely yours,



FOR

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

Enclosure: Label stamped "Accepted with Comments"
071910-00002 D425529

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ThermaCELL® Mosquito Repellent with Earth Scent



{Select appropriate marketing verbiage from "Marketing Text" section}

Active Ingredient:		
d-cis/trans allethrin	21.97%	
Other Ingredients	78.03%	
Total	100.00%	

Keep Out of Reach of Children
CAUTION
 See back [side] [bottom] panel for additional precautionary statements.

[This Package] Contains

1 [Reusable] Appliance

{Number} Butane [ThermaCELL®] Cartridge(s)
Net Contents 0.73 [1.58] fl. oz. [each]

and

{Number} [Insect] Repellent Mat(s)
Net Weight 0.08 oz. each

EPA Reg. No. 71910-3

EPA Est. 71998-THA-1

Manufactured for:
 The Schawbel Corporation
 26 Crosby Drive
 Bedford, MA 01730
 Toll Free: 1-8-NO SKEETERS
 Email: Consumerquestions@thermacell.net

Made and Printed in Italy
 Mats Made in Italy
 Manufactured in Thailand [Philippines]

ACCEPTED
 WITH COMMENTS
 In EPA Letter Dated:
 March 10, 2010
 Under the Federal Insecticide, Fungicide
 and Rodenticide Act, As amended, for the
 pesticide Registered under EPA Reg. No.:
 71910-3

Protected by one or more of the following U.S. Patents: 5,700,430; D300,606 [; D423,071; 6,033,212 C1]

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DIRECTIONS FOR USE

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

{The following directions will be used when mats are sold with or used in the appliance (ThermaCELL® Mosquito Repellent with Earth Scent):}

Allow 10 to 30 minutes, depending upon the size of the area, for product to take effect. This product works well in outdoor areas where there is minimal air movement, such as decks, unenclosed porches, patios and yards. Use one appliance per each 225 square feet (an area 15' x 15') or 15 feet in diameter. **Use Restrictions:** Only for outdoor use as an insect repellent. Do not use indoors, in tents or in any enclosed area. Do not insert anything other than ThermaCELL® mats into the appliance. Cover or remove all exposed food. Do not leave appliance unattended or use in windy conditions. Do not expose appliance or mats to rain. Do not attach appliance to your body or clothing. Place appliance on a flat, stable surface with the grill facing upward. Clean with a damp cloth only when the appliance is cool and inactive. Butane cartridges other than ThermaCELL® cartridges will not work in this appliance.

1. Remove one ThermaCELL® mat from wrapper. One mat lasts a maximum of 4 hours. Mat turns from pale blue to white when active ingredient has been exhausted.

2. Make sure the 'ON/OFF' switch on the appliance is in the 'OFF' position. Insert the mat under the appliance's black grill. To change mats, slide the 'ON/OFF' switch to 'OFF' and allow the appliance to cool completely. Push the used mat out by inserting a fresh one.

3. Remove the appliance cover and butane cartridge cap.

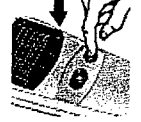
4. Screw the cartridge into the opening of the appliance. Make sure the cartridge is fully inserted by turning it clockwise until it stops. Replace the appliance cover. One ThermaCELL® butane cartridge lasts a maximum of 12 hours {0.73 fl. oz.} [a maximum of 28 hours {1.58 fl. oz.}]. If your appliance fails to heat, it may be out of fuel. Check the fuel level by holding the appliance vertically and looking at the fuel gauge on the bottom. You can see the amount of butane in the cartridge. Replace if empty.

5. Slide the 'ON/OFF' switch to the 'ON' position; the butane gas will begin to flow.

6. Wait approximately 5 to 10 seconds then depress the start button three to five times in rapid succession.

7. To verify the appliance is operating, pick it up and check the lens on the end of the appliance. The light at the end of the appliance glows when the appliance is heating. If the light is not glowing, check to make sure the appliance is 'ON' and cartridge is completely screwed into place; then once again depress the start button three to five times in rapid succession. Check to make sure the light is glowing.

8. Place the appliance on a flat, stable area, with the grill side facing up. Do not touch the grill; it will be hot after a couple of minutes. Some visible vapor will appear during use; this is normal. When finished using the appliance, slide the 'ON/OFF' switch to the 'OFF' position, and allow the appliance to cool completely. Appliance is now ready for storage.



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Storage and Disposal

Do not contaminate water, food or feed by storage or disposal.

Storage: Store unused mats in original box in a cool, dry place inaccessible to children and pets. Store appliance and butane cartridges in original box in a cool, dry place away from sources of heat. **Disposal:** Non-refillable container; do not refill or reuse this container. **If cartridge is empty or for used mats:** Do not reuse empty packaging, envelopes [wrappers] or cartridges. Do not puncture or incinerate empty cartridges. Place in trash or offer for recycling if available. **If cartridge is partly filled or for unused mats:** Call your local solid waste agency for disposal instructions. Never place unused mats down any indoor or outdoor drain. **For unwanted appliance:** Place in trash or offer for recycling if available. Batch Code: _____

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

CAUTION: Harmful if inhaled. Do not breathe vapors. Remove and wash contaminated clothing before reuse.

First Aid

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

{Note: The first aid statements' grid format will be used if market label space permits; otherwise a paragraph format will be used.}

Physical and Chemical Hazards

Extremely flammable. Contents under pressure. Keep away from fire, sparks and heated surfaces. Do not puncture or incinerate the butane container. Exposure to temperatures above 130°F may cause bursting.

Environmental Hazards

This product is toxic to fish, shrimp and aquatic invertebrates. Do not apply directly to water. Do not contaminate water when cleaning equipment or disposing of equipment washwater or rinsate. Drift may be hazardous to aquatic organisms in water adjacent to treated areas.

Guarantee: Appliance is guaranteed to last {number} year[s] from date of purchase. If [the] appliance fails to perform to your satisfaction, send the appliance and receipt to The Schawbel Corporation for a full refund of purchase price or repair or replacement.

Warranty and Disclaimers: Seller will not be held responsible for damage, injury or poor performance caused by use of other butane cartridges or repellent mats. Seller is not responsible for damage caused by using this butane cartridge in other butane products.

ThermaCELL® is a Registered Trademark of the Schawbel Corporation

{Mat Label}

ThermaCELL® Mosquito Repellent with Earth Scent Mat	
Active Ingredient:	
d-cis/trans allethrin	21.97%
Other Ingredients	78.03%
Total	100.00%
Keep Out of Reach of Children	
CAUTION	
See outer carton for additional precautionary statements and Directions for Use.	

Net Weight: 0.08 oz.
EPA Reg. No. 71910-3 EPA Est. 43917-ITA-1
Manufactured for:
The Schawbel Corporation
26 Crosby Drive Bedford, MA 01730
Made [and Printed] in Italy

(ThermaCELL® Butane Cartridge Labeling)

ThermaCELL® Butane Cartridge
Keep Out of Reach of Children
CAUTION

Physical and Chemical Hazards

Extremely flammable. Contents under pressure. Keep away from fire, sparks and heated surfaces. Do not puncture, break or incinerate the butane container, even after use. Exposure to temperatures above 130°F may cause bursting. Protect the butane cartridge from sunlight. Use only with ThermaCELL® products.

See box for additional precautionary statements.

Net Contents: 0.73 [1.58] fl. oz.

The Schawbel Corporation
26 Crosby Drive
Bedford, MA 01730

[ThermaCELL® is a Registered Trademark of the Schawbel Corporation]

(Appliance Labeling)

(Promotional Item Language (when appliance is used as a promotional item):)

NWTF Logo National Wild Turkey Federation
Team Realtree Logo [America's Most Versatile Camo Pattern]
Realtree Hardwoods Green HD Logo

ThermaCELL® Mosquito Repellent Appliance
ATTENTION - HOT SURFACE
Keep Out of Reach of Children
CAUTION

Read **Directions for Use** and **Precautionary Statements** on box prior to use.

Only for outdoor use as an insect repellent. Do not use indoors, in a tent or any enclosed area. Do not touch the [black] grill while the appliance is in use. [Black] [G]grill is hot while in use. Place on a flat, stable surface with the [black] grill facing upward. Do not cover with any material while in use. Do not expose appliance to rain. Butane cartridges and mats other than ThermaCELL® will not work in this appliance.

EPA Reg. No. 71910-3 EPA Est. 71998-THA-1, 43917-ITA-1

The Schawbel Corporation
26 Crosby Drive
Bedford, MA 10730
781-541-6900

U.S. Patent Nos. 5,700,430; D423,071

[ThermaCELL® is a Registered Trademark of the Schawbel Corporation]

{Refill Labeling}

ThermaCELL® Mosquito Repellent with Earth Scent

REFILLS



{Select appropriate marketing verbiage from "Marketing Text" section}

{Value {or other descriptive term} Packs}

{Number} Refill[s]



Active Ingredient:

d-cis/trans allethrin	21.97%
Other Ingredients	78.03%
Total	100.00%

Keep Out of Reach of Children

CAUTION

See back [side] [bottom] panel for additional precautionary statements.

[This Package] Contains
 {Number} Butane [ThermaCELL®] Cartridge(s)
 Net Contents 0.73 [1.58] fl. oz. [each]
 and
 {Number} [Insect] Repellent Mat(s)
 Net Weight 0.08 oz. each

EPA Reg. No. 71910-3 EPA Est. 71998-THA-1

Manufactured for:
The Schawbel Corporation
 26 Crosby Drive
 Bedford, MA 01730

Toll Free: 1-8-NO SKEETERS

Email: Consumerquestions@thermacell.net

Made and Printed in Italy Mats Made in Italy [Manufactured in Philippines]

Protected by one or more of the following U.S. Patents: 5,700,430; D300,606; 6,033,212 C1

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DIRECTIONS FOR USE

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

Allow 10 to 30 minutes, depending upon the size of the area, for product to take effect. Each mat lasts a maximum of 4 hours and each cartridge lasts a maximum of 12 {0.73 fl. oz.} [28 {1.58 fl. oz.}] hours. Mats turn from pale blue to white when repellent has been exhausted. Use one appliance for each 225 square feet or 15 feet in diameter. To change mats, make sure appliance is off and cool, then push used mat out by inserting a fresh one. **Use Restrictions:** Only for outdoor use as an insect repellent. Do not use indoors, in tents or in any enclosed area. Do not insert anything other than ThermaCELL® mats into the appliance. Cover or remove all exposed food. Do not leave appliance unattended or use in windy conditions. Do not expose appliance or mats to rain. Do not attach appliance to your body or clothing. Place appliance on a flat, stable surface with the grill facing upward. Clean with a damp cloth only when the appliance is cool and inactive. Butane cartridges other than ThermaCELL® cartridges will not work in the appliance.

ThermaCELL® Mosquito Repellent with Earth Scent

1. Remove one mat from wrapper.
2. With appliance off and completely cool, insert mat under grill.
3. Remove appliance cover and butane cartridge cap. Screw cartridge into appliance and replace appliance cover [if provided].
4. Move switch to 'ON', wait 5 to 10 seconds then depress 'START' button 3 to 5 times in rapid succession.
5. Verify appliance is heating; [orange] light will glow. If the light is not glowing, make sure cartridge is completely screwed into place; then repeat step 4. Place on a flat, stable area.
6. When finished using, turn switch to 'OFF'. Allow to completely cool and then store.

Storage and Disposal

Do not contaminate water, food or feed by storage or disposal.

Storage: Store unused mats in original box in a cool, dry place inaccessible to children and pets. Store unit and butane cartridges in original box in a cool, dry place away from sources of heat. **Disposal:** Non-refillable container; do not reuse or refill this container. **If cartridge is empty or for used mats:** Do not reuse empty packaging, envelopes [wrappers] or cartridges. Do not puncture or incinerate empty cartridges. Place in trash or offer for recycling if available. **If cartridge is partly filled or for unused mats:** Call your local solid waste agency for disposal instructions. Never place unused mats down any indoor or outdoor drain.

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

CAUTION: Harmful if inhaled. Do not breathe vapors. Remove and wash contaminated clothing before reuse.

First Aid

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

{Note: The first aid statements' grid format will be used if market label space permits; otherwise a paragraph format will be used.}

Physical and Chemical Hazards

Extremely flammable. Contents under pressure. Keep away from fire, sparks and heated surfaces. Do not puncture or incinerate butane container. Exposure to temperatures above 130°F may cause bursting.

Environmental Hazards

This product is toxic to fish, shrimp and aquatic invertebrates. Do not apply directly to water. Do not contaminate water when cleaning equipment or disposing of equipment washwater or rinsate. Drift may be hazardous to aquatic organisms in water adjacent to treated areas.

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Warranty and Disclaimers: Seller will not be held responsible for damage, injury or poor performance caused by use of other butane cartridges or repellent mats. Seller is not responsible for damage caused by using this butane cartridge in other butane products.

{Marketing Text for use on boxes;}

~~Additional products made by ThermaCELL® include: {graphics and names of appliances}~~

- Also works on [repels] black flies
- Buy one get one free
- Convenient
- Coupon [{\$} {number} Rebate[s]] inside
- Easy to use
- Effective
- Portable
- Powered by ThermaCELL®
- Refills [are] available
- Silent

~~ThermaCELL® makes {sells} additional mosquito repellent products, including {graphics and names of appliance, compact appliance, compact appliance with self start, lantern, Patio/Outdoor lantern, mini lantern and mini lantern with self start}~~

~~ThermaCELL® product line includes {graphics and names of appliance, compact appliance, compact appliance with self start, lantern, Patio/Outdoor lantern, mini lantern and mini lantern with self start}~~

- Value {or other descriptive term} Pack: {number} dollar savings [off regular price]
- Value {or other descriptive term} Pack: {number} [free] refills [appliance,] [compact appliance,] [compact appliance with self-start] inside.

Repellency

- [Each] cartridge lasts a maximum of 12 hours {0.73 fl. oz.}
- Each mat lasts a maximum of 4 hours
- Provides 15 ft diameter repellency
- Provides 225 sq ft of repellency for a maximum of 4 hours per mat
- Repellency lasts a maximum of {number} hours {"number" determined by number of mats in box multiplied by 4 hours per mat}
- Repellent lasts a maximum of 4 hours [per mat]
- Repels mosquitoes, black flies and other flying insects
- Repels mosquitoes and black flies for a maximum of {number} hours {"number" determined by number of mats in box multiplied by 4 hours per mat}
- Repels mosquitoes using a heat-activated repellent mat
- Repels mosquitoes, black flies and other [outdoor] flying insects from an area a maximum of 15 by 15 feet
- Repels mosquitoes, black flies and other [outdoor] insects in an area as large as an average size deck or patio or campsite [from an average size deck, patio, campsite] for hours
- Repels mosquitoes, black flies and other [outdoor] flying insects creating an [area] of repellency

How it [ThermaCELL® Mosquito Repellents] Works

- Heat-activated repellent mat repels mosquitoes, black flies and other [outdoor] flying insects
- ThermaCELL® cartridge heats the repellent mat

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Where Product is Used

- For hunting

Scent

- Earth Scent {or other appropriate description}
- Earth Cover Scent
- Earth Cover Scent to mask [masks] human odor
- For hunters
- Insect [bug] repellent for hunters
- Masks human odor
- No game-spooking odors
- Place product upwind for maximum repellency
- Repellent does not spook game [Won't spook game]
- Repellent mats with Earth Scent
- Repels bugs and [simultaneously] masks human odor
- Smells like dirt
- ThermaCELL® has added an earth cover scent to its mosquito repellent so hunters can now mask their own scent and keep the bugs away.
- ThermaCELL® Mosquito Repellent with Earth Scent

Other

- Effective repellency
- Refills available wherever Schawbel [ThermaCELL®] repellent products are sold



- The Schawbel Corporation [Schawbel] offers convenient refill kits for use with this product

Mosquitoes, black flies, bugs, outdoor flying insects and biting blackflies can spoil just about any hunting trip. Now you can alleviate the annoyance from these insects for a maximum of four hours [per mat]; it silently and continuously releases a repellent that repels mosquitoes, [biting] black flies, outdoor flying insects and bugs [for a maximum of {number} hours.]. This product efficiently repels and reduces the annoyance of mosquitoes, [biting] black flies, outdoor flying insects and bugs in an area 15 feet in diameter or 225 square feet [an area 15' by 15'] for a maximum of {number} hours. This product is portable. This product is silent. It is effective and easy to use.

{Promotional item language (when appliance is used as a promotional item)}

NWTF Logo National Wild Turkey Federation
Team Realtree logo [America's Most Versatile Camo Pattern]
Realtree Hardwoods Green HD logo

[] Denotes alternate/optional verbiage
{ } Denotes verbiage not printed on market labeling