

DATE OUT: 09/23/05

SUBJECT: FEE: PRODUCT CHEMISTRY REVIEW OF MP [] EP [X]

DP BARCODE No.: 315501 **File Symbol No.:** 121-OL

PRODUCT NAME: CUTTER INSECT REPELLENT

COMPANY: SPECTRUM, A DIVISION OF UNITED INDUSTRIES

FOOD USE [] INTEGRATED FORMULATION []

PCC: 070705 **Decision No.** 355159

FROM: *(A) 09/26/05*
Reviewer Name: Indira Gairola, Chemist
Product Chemistry Team
Technical Review Branch/RD (7505C)

SBM 9/26/05 -

TO: Richard Gebken/ Joseph Tavano PM 10
Insecticide Branch/RD(7505C)

INTRODUCTION:

SPECTRUM is seeking registration for the subject product CUTTER INSECT REPELLENT that contains 10.0% of Picardin. Applicant has submitted a Basic CSF dated 09/15/05. Details are listed below:

SUMMARY OF FINDINGS

1. SPECTRUM has submitted MRID #s 464980-01, - 02, & cited MRID # 461848-09 for Product Chemistry data to support the registration of. CUTTER INSECT REPELLENT.
2. The source of active ingredient is registered.
3. The inerts used are cleared for the proposed use.
4. Basic CSF dated 09/15/05 meets the label claim of 10.0 % of active ingredient Picardin. and is acceptable.
5. Data corresponding to the Sub Group A completely satisfy the data requirements of 40CFR§158.155 to §158.180.
6. Data corresponding to the guideline reference 830.1800 (Enforcement of analytical method) satisfy the data requirements of 40CFR§158.180. (GC Method) was used for analysis of active ingredient.
7. Applicant has indicated that Storage Stability (830.6317) and Corrosion

Characteristics, studies (830.6320) will be conducted .

A one year Storage Stability (830.6317) and Corrosion Characteristics, (830.6320) studies are a requirement for the formulated product . The registrant is required to generate one year storage stability(830.6317) study for the proposed product under warehouse conditions. It is recommended that observations be made at 0, 3, 6, 9, and 12 months intervals. The corrosion characteristics (830.6320) study may be carried out concurrently.

The registrant may request the PM for conditional registration while the study is in progress.

Please have the registrant submit the results electronically if possible along with the hard copy.

8. Data corresponding to the Sub Group B satisfy the data requirements of 40CFR §158.190 except finding #7.

CONCLUSIONS:

TRB has reviewed the product chemistry data submitted for the above mentioned subject product end-use product and has concluded that:

1. The subject product contains 10.0% of Picardin.
2. The label claim is in compliance with PR Notice 91-2.
3. The Basic CSF dated 09/15/05 is acceptable with comments . See note below.???
4. The product chemistry data requirements for series 830 Subgroup A and B have been satisfied except finding #7.

BARCODE No.: 355159 File Symbol No.: 121-OL PRODUCT NAME: CUTTER INSECT REPELLENT

PRODUCT CHEMISTRY DATA (SERIES 830 Subgroup A & Subgroup B) Subgroup A	Data Required Fulfilled	MRID No.
830.1550. Chemical Identity (Basic CSF)	Y	09/15/05
830.1600. Beginning Materials	Y	464980-02
30.1650. Formulation Process	Y	464980-02
830.1670. Discussion of Impurities	Y	464980-02
830.1700. Preliminary Analysis	NA	
830.1750. Certified Limits (Basic CSF)	Y	09/15/05
830.1800. Enforcement Analytical Method	Y	461848-09

Subgroup B	Data Required Fulfilled	Value or Qualitat. Descrip.	MRID No.
830.6302. Color	Y	Clear water white	464980-01
830.6303. Physical State	Y	Liquid (non pressurized portion)	464980-01
830.6304. Odor	Y	Mild alcohol	464980-01
830.6314. Oxidation/Reduction Action	Y	No reactions.	464980-01
830.6315. Flammability	Y	79.5°F (non pressurized portion)	464980-01
830.6316. Explodability	NA	contains no explosive ingredients	464980-01
830.6317. Storage stability	I	I	464980-01
830.6319. Miscibility	NA	NA	464980-01
830.6320. Corrosion Characteristics	I	I	464980-01
830.6321. Dielec. Bkd. Vltg.	NA	Not intended for use around electric equipment	464980-01
830.7000. pH	Y	7.67	464980-01
830.7100. Viscosity	NA	NA	464980-01
830.7300. Density/Bulk Density	y	0.9434	464980-01

Explanations: Y = The Requirements Were Fulfilled; N = The Requirements Were Not Fulfilled; NA = Not applicable; G = Data Gap; U = Requires Upgrading; I = Incomplete or In Progress; W = Waived.

MRID DER # 464980-02

Page 4 is not included in this copy.

Pages ___ through ___ are not included in this copy.

The material not included contains the following type of information:

- Identity of product inert ingredients.
- Identity of product impurities.
- Description of the product manufacturing process.
- Description of quality control procedures.
- Identity of the source of product ingredients.
- Sales or other commercial/financial information.
- A draft product label.
- The product confidential statement of formula.
- Information about a pending registration action.
- FIFRA registration data.
- The document is a duplicate of page(s) _____.
- The document is not responsive to the request.

The information not included is generally considered confidential by product registrants. If you have any questions, please contact the individual who prepared the response to your request.
