

APR 6 1990

Miles Laboratories, Inc
Household Products Division
7123 West 65th Street
Chicago, IL 60638

Dear Blaine Byers

Subject: Cutter Evergreen Scent Insect Repellent Pump Spray Formula NMI
EPA Reg. No. 121-29
Application dated February 16, 1990

The proposed amendment to the registration of the product cited above under the Federal Insecticide Fungicide and Rodenticide Act removing MGK R-11 from the formulation is acceptable subject to the comments listed below. A stamped copy of the label is enclosed for your records.

- 1) Delete the percentage for total active ingredients (26%) from the ingredients statement.
- 2) Explain the discrepancy between the PH for the product listed in the Confidential Statement of Formula (CSF) and the PH listed in the storage stability study.
- 3) Explain why the PH for the product dropped in the storage stability study.
- 4) Explain the difference between the density of the product listed on the CSF 0.860 g/ml and in the chemistry data 0.865 g/ml. Which is correct?
- 5) Submit the chemical identity of the fragrance, Haarmann & Reimer 78041. Identify all components by Chemical Abstracts Number and percentage in the mixture. Submit a Manufacturing Safety Data Sheet (MSDS).

55890111TAVAN0YK=121KENC0:4/2/90:3/2/90:dg:sw:vo:dd:dg

CONCURRENCES

SYMBOL	M7505c						
SURNAME	Tavan						
DATE	4/3/90						

- 6) Submit a 1 year storage stability study for the product. The formulated product must be analyzed for its active ingredients at time zero and during a year of storage. The storage should be under warehouse conditions of temperature and humidity using containers similar to those that will be used in the trade. This data must be submitted within 15 months of the date of this letter.

Submit five (5) copies of the corrected finished label before the product is released for shipment under this amended labeling.

Sincerely yours,



Phil Hutton
 Product Manager (17)
 Insecticide-Rodenticide Branch
 Registration Division (H7505C)

NOW... PROTECTION THAT LASTS AND LASTS WITH FRESH, EVERGREEN SCENT

Cutter

provides many hours of protection for the whole family from mosquitoes, gnats, biting flies. Also repels ticks, chiggers, fleas. Cutter Evergreen is not greasy and offers a fresh evergreen scent for those who dislike repellent odor.

HOLD UPRIGHT WHEN SPRAYING

PRECAUTIONARY STATEMENTS: WARNING: HAZARDS TO HUMANS: For external use only. May cause eye injury. Do not get in eyes or mouth. Harmful if swallowed. Avoid contact with lips or open cuts.

PHYSICAL/CHEMICAL HAZARDS: FLAMMABLE: Do not use or store near heat sources, sparks or open flame.

STATEMENTS OF PRACTICAL TREATMENT:

IF SWALLOWED: Call a physician or Poison Control Center. Get medical attention.

IF ON SKIN: May cause skin reactions in rare cases. If so, wash thoroughly with soap and water. Get medical attention if irritation persists.

IF IN EYES: Flush with plenty of water. Get medical attention.

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

Hold unit 6 to 8 inches from skin or clothing while spraying, keeping sprayer pointed away from face. Slightly moisten skin or clothing. Frequent reapplication and saturation is unnecessary. Apply on face by first spraying small amounts in palm of hand and spreading on face and neck. Do not apply to the hands of young children. To repel ticks, chiggers, and fleas, spray pant cuffs, socks and around openings in outer clothing. For maximum protection on skin, spread by hand after application. Will not damage nylon, cotton or wool. May damage some synthetic fabrics, plastics, leather, painted or varnished surfaces.

DISPOSAL: Do not reuse empty container. Rinse thoroughly before discarding in trash.

EPA Reg. No. 121-29
EPA Est. No. 33764 CA 1 C
EPA Est. No. 10744 IL 1 C
EPA Est. No. 11715 TN 1 C

Circled code corresponds to first letter of state in which container was filled.



Miles for c 1989 Miles Inc.
Consumer Household Products Division, 7123 W 65th St, Chicago, IL 60638 USA

Evergreen

Cutter
INSECT REPELLENT

FORMULA MM

PUMP SPRAY
PROTECTION THAT LASTS AND LASTS
Repels Mosquitoes, Ticks, & Biting Flies

ACTIVE INGREDIENTS:
DEET (N,N-DIETHYL-M-TOLUAMIDE)
OTHER ISOMERS
N-OCTYL-BICYCLOHEPTENE-DICARBOXIMIDE

INERT INGREDIENTS:

KEEP OUT OF REACH OF CHILDREN
WARNING: Read cautions on back.

NET 4 FL. OZ. (120 ml)

ACCEPTED
with COMMENTS
in EPA Letter Dated:

06 1990

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, this pesticide is registered under EPA Reg. No.

121-29

