

JAN 15 1991

Mr. Blaine Byers
Niles Laboratories, Inc.
Household Products Division
7123 West 65th Street
Chicago, IL 60638

Dear Mr. Byers

Subject: Cutter Evergreen ^{Insect} Repellent Spray Formula MMI
EPA Registration No. 121-31
Your Application Dated July 2, 1990

The proposed amendment to the registration of the product cited above under the Federal Insecticide, Fungicide, and Rodenticide Act, removing the active ingredient MGK 264, and substituting two alternate cosolvents, is acceptable subject to the comments listed below. A stamped copy of the label is enclosed for your records.

1. The following toxicity studies on the product as formulated must be submitted within 1 year of the date of this letter.
 - a. Primary Eye Irritation study;
 - b. Primary Skin Irritation study; and
 - c. Skin Sensitivity study.
2. The following toxicity requirements must also be addressed. However, for these requirements you may reference the specific appropriate studies from the DEET Registration Standard.
 - a. Acute Oral;
 - b. Acute Dermal; and
 - c. Acute Inhalation.

51335:I:Tavano:LCBI-06:KENCO:12/17/90:01/17/91:CL:VO:EK:DD

CONCURRENCES

SYMBOL	H7505C							
SURNAME	Tavano							
DATE	1/9/91							

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3. Since the removal of MGK-264 is a permanent change, you must submit a new Confidential Statement of Formula (CSF) for one of the alternate formulae designating it as the basic formulation.
 4. We note that the 1 year storage stability study has been started. This data must be submitted within 15 months of the date of this letter.
 5. The source product for DEET under EPA Registration No. 1187-103 was transferred to EPA Registration No. 54282-23 which was cancelled on October 10, 1989. Therefore, this source can no longer be used. The CSF must therefore be revised by deleting this source (basic and alternate formula).

Sincerely yours,

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

Enclosure

