

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

Dear Mr. Byers

Subject: Cutter Insect Repellent Spray Formula MMI
EPA Registration No. 121-33
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 three 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						

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,



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

Enclosure

MC820 YELLOW ORANGE GLOW DK GREEN



**PROTECTION THAT
LASTS AND LASTS!**

**Repels Mosquitoes,
Ticks, & Biting Flies**

ACTIVE INGREDIENTS: 23.0%
DEET (N,N-DIETHYL-M-TOBTAMIDE) 21.85%
OTHER ISOMERS 1.15%
INERT INGREDIENTS: 77.0%

**KEEP OUT OF REACH OF CHILDREN
WARNING**

Read cautions on back panel

NET WT. 6 OZ. (170 gms)

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

**NOW... PROTECTION THAT
LASTS AND LASTS WITHOUT
UNPLEASANT SCENT**

Cutter provides many hours of protection for the whole family from mosquitoes, gnats, biting flies. Also repels ticks, chiggers, fleas. Cutter Unscented is not greasy, and ideal for those who dislike strong repellent odor.

This aerosol spray allows you to hold the can and spray any angle... even upside down... to cover ankles, legs, even your back.

PRECAUTIONARY STATEMENTS

WARNING: HAZARDS TO HUMANS: For external use only. May cause irritation. Do not get in eyes or mouth. Harmful if swallowed. Avoid breathing spray mist. Avoid contact with lips or open cuts. Do not apply to excessive sunburned skin. Do not expose treated skin or clothing to fire, sparks or flames until liquid has evaporated.

PHYSICAL/CHEMICAL HAZARDS: EXTREMELY FLAMMABLE. Contents under pressure. Do not use or store near fire, sparks, or heat sources. Do not puncture or incinerate container. Exposure temperatures above 130°F may cause bursting.

STATEMENTS OF PRACTICAL TREATMENT

IF SWALLOWED: Call a physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person.

IF ON SKIN: May cause skin reactions in rare cases. If so, wash with soap and water. Get medical attention if irritation persists. 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. Keep nozzle pointed away from face. Slightly moisten skin or clothing with a damp cloth. 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. Do not damage nylon, cotton, wool. May damage some synthetic fabrics, plastic, watch crystals, leather paint, and varnished surfaces.

DISPOSAL: Do not reuse empty container. Discard in trash. Do not puncture or incinerate.

EPA Reg. No. 121-14
EPA Est. No. 37261 (CA)
EPA Est. No. 1215 (IN)
EPA Est. No. 10744 (IL)

Enclosed code corresponds to first letter of lot on bottom of can.



JAN

Active
Insecticide
No.

121-33

AMERICAN-NATIONAL GRAPHIC ARTS CENTER

ARTWORK MC820	CUSTOMER MILES CHICAGO
CONTROL M17184	COLORS YELLOW ORANGE GLOW DK GREEN ON W.C.
COPY	DESIGN
SEPARATION	APPROVED BY

JOB ORDER	N 48
SIZE	200 202 201 X 50
STYLE LAYOUT	NECKED IN WELDED AEROSOL

DATE **3-5-90**