

APR 6 1990

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

Dear Blaine Byers

Subject: Cutter Insect Repellent Pump Spray Formula NMI
EPA Reg. No. 121-34
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 ingredient statement.
- 2) Be sure that the percentage for the active ingredient, N-Octyl Bicycloheptane Dicarboximide, is clearly marked in the ingredient statement.
- 3) Explain the difference between the density for the product listed on the Confidential Statement of Formula (CSF) 0.860 g/ml and in the chemistry data matrix 0.865 g/ml. Which percentage is correct?
- 4) Submit a 1 year storage stability study for the product. The formulated product must be analyzed for its active ingredient 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.

55890:I:Tavano;K-12;KENCO;4/2/90;5/2/90:dg:sw:cd:dg

CONCURRENCES

SYMBOL	H7505C							
SURNAME	Tavano							
DATE	4/3/90							

- 5) Explain the discrepancy between the PH for the product listed on the Confidential Statement of Formula (CSF) and the storage stability study.

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 WITHOUT UNPLEASANT SCENT

Cutter contains the most effective repellent ingredient ever developed and 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.

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. 121.34. Other code on back panel for identification purposes to help EPA Reg. No. 10744. EPA Reg. No. 121.15. EPA Reg. No. 121.15. EPA Reg. No. 121.15.



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FORMULA #MM1

PUMP SPRAY

PROTECTION THAT LASTS AND LASTS!

Repels Mosquitoes, Ticks, & Biting Flies

ACTIVE INGREDIENTS	
DEET (N,N-DIETHYL-M-TOLUAMIDE)	26.0%
OTHER SOAKERS	20.9%
N-OCTYL-BICYCLOHEPTENE-DICARBONAMIDE	1.1%
2,3,4,5-TETRAHYDRO-2H-PYRIDINE	3.0%
TETRAHYDRO-2-FURANOL-3-OL	1.0%
INERT INGREDIENTS	48.0%

KEEP OUT OF REACH OF CHILDREN

WARNING Read cautions on back panel

NET 4 FL. OZ. (120 mL)



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