

121-76

4/21/2009

1 of 4



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460-0001

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

April 21, 2009

Mr. William H. Metzger,  
Division Vice-President - Regulatory Affairs  
SPECTRUM, Division of United Industries Corporation  
P.O. Box 142642  
St. Louis, MO 63114-0642

**Subject: Amended Labeling, Response to Notice of Reregistration Dated September 23, 2008  
CUTTER Insect Repellent RDC008RP, EPA Reg. No. 121-76  
Your Rebuttal Dated January 30, 2009**

Dear Mr. Metzger:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable with the following label revision provision(s):

Directions for Use section comment(s):

1. In the 24<sup>th</sup> sentence, insert the word "a" immediately preceding the word "reaction."

First Aid Statement section comment(s):

2. In your rebuttal, you mentioned that the existing "HOTLINE NUMBER:" subsection was sufficient/acceptable and that it takes customer calls to your Poison Control Center contractor; however, you did not mention if that toll-free number was available twenty-four (24) hours per day and seven (7) days per week for answering and responding to any medical emergencies or health concerns. As mentioned in the EPA letter, dated September 23, 2008, to facilitate inclusion of revised language from the acute toxicity review completed for this product, replace the "HOTLINE NUMBER:" subsection with: "HOTLINE NUMBER: For additional information on this pesticide product (including health concerns, medical emergencies, or going for treatment, you may call 1-800-767-9927."

The Agency determined in the DEET RED document that all aerosol and pump spray formulations must be packaged in containers utilizing a concave trigger to help aim product or other comparable mechanism that will ensure that the product will not be inadvertently sprayed in the eyes. In addition, current labels on DEET repellent products tend to dissolve from contact with the repellent (usually liquids). All reregistered DEET product labels must use materials that remain permanent and readable for the reasonable life of the product.

The Agency is in the process of developing and improving the current Efficacy Assessment Guidelines for repellent products. The Agency intends to defer the determination of any related efficacy data requirements supporting the claims that may appear on this label until these Efficacy Assessment Guidelines are complete. When the guidelines are finalized, the Agency expects to issue a Data Call-In to address the revised guidelines to all registrants with registrations for personal repellent products that have not previously submitted efficacy data sufficiently consistent with the revised guidelines.



Front Panel

# CUTTER

## Insect Repellent RDC008RP

[Clear Spray • Crystal Clear Spray • It won't stain • Not greasy or oily • Pump spray • Makes You Invisible to Bugs • Fresh Scent • With Aloe Vera • With vitamin E • Contains skin conditioners like soothing Aloe Vera and has a fresh, clean scent • Soft on skin because it contains skin conditioners like Aloe Vera • Soft on skin, tough on bugs • Feels great on you, tough on bugs too • Leaves skin feeling soft and smooth • with Aloe & Vitamin E • Moisturizes skin • Moisturizes with Aloe Vera • Clean, fresh scent • Effective, dependable protection • Pleasant, effective protection • Repels mosquitoes, chiggers, ticks, biting flies, no-see-ums, gnats and fleas • Repels biting insects for hours • Pleasant, effective protection from mosquitoes, chiggers, ticks, biting flies, no-see-ums, gnats and fleas • Resists perspiration • Water resistant [formula] • Water resistant [sports formula] • Sweat resistant [formula] • [Non-greasy and] resists perspiration • For active families • Repels Mosquitoes that May Carry West Nile Virus • Mosquito Repellent • CONTAINS DEET [n,n-Diethyl-m-toluamide] • Cooling Clean Scent]

ACCEPTED  
With COMMENTS  
In EPA Letter Dated:  
*April 21, 2009*

Under the Federal Insecticide, Fungicide  
and Rodenticide Act, As amended, for the  
pesticide Registered under EPA Reg. No:  
*121-76*

Active Ingredient: DEET ..... 7.0%  
Other Ingredients ..... 93.0%

KEEP OUT OF REACH OF CHILDREN

WARNING: Read cautions on back

Net 6 fl.oz (177 mL)

[Bracketed Text] = (Optional language

### OPTIONAL MARKETING CLAIMS

[Now . . . Pleasant protection that's effective for hours!

#### OPTION 1

Cutter Insect Repellent RDC008RP is specially formulated to repel mosquitoes, ticks, biting flies, gnats, chiggers, fleas and no-see-ums. Cutter Insect Repellent RDC008RP offers pleasant protection that's never greasy or oily, and the fresh, clean scent won't leave you smelling like a bug repellent. Convenient pump spray for easy application to both skin and clothing.

#### OPTION 2

Cutter Insect Repellent RDC008RP clear spray provides hours of protection from mosquitoes and biting flies. Also repels ticks, chiggers, no-see-ums, gnats, and fleas. Cutter Insect Repellent RDC008RP offers pleasant protection: it has a fresh, clear scent and is not greasy. Convenient pump spray for easy application.

#### OPTION 3

Cutter Insect Repellent RDC008RP feels great on you because it contains skin conditioners like soothing aloe vera and vitamin E while it repels biting insects for hours. New clear spray is specially formulated to repel mosquitoes, ticks, biting flies, gnats, chiggers, fleas and no-see-ums. Cutter Insect Repellent RDC-008RP is never greasy or oily and has a fresh scent. Cutter Insect Repellent is also available in a convenient aerosol, handy towelette, soothing clear gel, and insect repellent with sunscreen.

#### OPTION 4

Convenient, effective Cutter Insect Repellent RDC008RP is now in a pump spray for easy application to both skin and clothing. It keeps you free from mosquitoes and other biting bugs. Cutter Insect Repellent is also available in an easy-to-use aerosol, handy towelette, soothing clear gel, and insect repellent with sunscreen.]

Back Panel

**STOP**. Read and follow all directions and precautions on this product label.

### DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. For outdoor use only.

Do not spray in enclosed areas. Hold container upright about 6 - 8 inches from skin or clothing and spray with a slow sweeping motion. Slightly moisten skin. Use just enough repellent to cover exposed skin and/or clothing. Do not use under clothing. [For maximum protection on skin, spread with hand after application.] Do not spray

3044

directly onto face. Spray on hands first, and then apply sparingly to face, avoiding eyes. Do not apply near eyes and mouth. Apply sparingly around ears. Do not apply over cuts, wounds or irritated skin. Do not apply to sunburned skin. Do not apply to children's hands. Do not allow children to handle this product. When using on children, apply to your own hands and then put it on the child. [For extra protection from [crawling] ticks, chiggers and fleas, spray along all openings of clothing, such as neckband, waistband, pant and sleeve cuffs, sock tops and other areas where insects may crawl under clothing.] [Frequent reapplication or saturation is unnecessary.] Avoid over-application of this product. After returning indoors, wash treated skin with soap and water [and double-check yourself, other family members and pets for ticks.] Wash treated clothing before wearing it again. Will not damage nylon, cotton, or wool. May damage some synthetic fabrics, plastics, watch crystals, leather, painted or varnished surfaces. Use of this product may cause skin reactions in rare cases. If you suspect reaction to this product, discontinue use, wash treated skin and call your local Poison Control Center. If you go to a doctor, take this product with you.

### STORAGE AND DISPOSAL

**Pesticide Storage:** Store the product in a cool, dry place, out of reach of children.  
**Container Disposal:** If empty: Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. **If partly filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

### PRECAUTIONARY STATEMENTS

#### Hazards to Humans and Domestic Animals

**WARNING.** Causes substantial but temporary eye injury. Harmful if swallowed. Do not get in eyes. Use of this product may cause skin reactions in rare cases. Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash treated clothing before use.

#### First Aid

**If in Eyes:** Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing. Call a Poison Control Center or doctor for treatment advice. **If Swallowed:** Call a Poison Control Center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a Poison Control Center or doctor. **Do not give anything by mouth to an unconscious person. IF YOU SUSPECT A REACTION TO THIS PRODUCT:** Discontinue use. Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a Poison Control Center or doctor for treatment advice.  
**HOTLINE NUMBER:** In case of an emergency call toll free [1-800-767-9927].

Have the product container or label with you when calling a Poison Control Center or doctor for treatment advice.

**NOTE TO PHYSICIAN:** Probable mucosal damage may contraindicate the use of gastric lavage.

### Physical or Chemical Hazards

**COMBUSTIBLE** - Do not use or store near heat or open flame.

**NOTICE:** To the extent consistent with applicable law buyer assumes all responsibility for safety and use not in accordance with directions.

**Questions or Comments?** Call 1-800-332-5553.

[Visit our web site at [www.skeeterbites.com](http://www.skeeterbites.com)]

Made in the USA for Spectrum,  
 Division of United Industries Corporation  
 P O Box 142642  
 St. Louis, MO 63114-0642

EPA Reg. No. 121-76

EPA Est. No. 9688-MO-1

© 2009

40f4