

121-85

10/6

William H. Metzger
Spectrum, Division of United Industries
P.O. Box 142642
St. Louis, MO 63114-0642

APR 21 2010

Subject: Child Resistant Packaging Certification Dated February 26, 2010, to support Label Amendment Submission Dated December 2, 2010 (Response to Agency Letter Dated February 2, 2010)
Product Name: Cutter Insect Repellent Prometheus
EPA Reg. No: 121-85
Decision Number: 424294

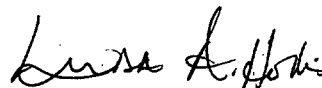
Dear Mr. Metzger:

The amendment referred to above, submitted in connection with registration under FIFRA section 3(c)(7)(A), is acceptable provided that you:

1. Submit and/or cite all data required for registration/reregistration of your product under FIFRA section 3(c)(5) when the Agency requires all registrants of similar products to submit such data.
2. Submit five (5) copies of your final printed labeling before you release the product for shipment. Final printed labeling means the label or labeling of the product when distributed or sold. Clearly legible reproductions or photo reductions will be accepted for unusual labels, such as those silk-screened directly onto glass or metal containers or large bags or drum labels.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions. Should you have any questions regarding this action, you may contact Gina Casciano at (703) 605-0513 or via email at casciano.gina@epa.gov. A stamped copy of the label is enclosed for your records.

Sincerely,



Linda A. Hollis, Chief
Biochemical Pesticides Branch
Biopesticides and Pollution
Prevention Division (7511P)

				CONCURRENCES			
SYMBOL	7611P Enclosure	7611P	7511P				
SURNAME	Casciano	Hollis	COLE				
DATE	4/13/10	4/13/10	4/13/10				

CUTTER Insect Repellent PROMETHEUS

For outdoor use only.

Optional marketing claims and language are included within each Sub-Label

ACCEPTED

APR 21 2010

Under the Federal Insecticide, Fungicide,
and Rodenticide Act, as amended, for
the pesticide registered under
EPA Reg. No. 121-85

Active Ingredient:

Oil of Citronella	3%
Other Ingredients*	97%

*Contains petroleum hydrocarbons

KEEP OUT OF REACH OF CHILDREN

CAUTION See back for additional precautions.

Net Contents 12 fl. oz. (for pre-filled canisters), or 1 Gallon (for fuel container)

Sub-Label A (Pre-filled Torch and Refills)

Optional Marketing Claims

[Makes You Invisible To Bugs • Easy to use • Ready to light • Easy to light • Pre-filled [drop-in] [bottle] [canister] [cartridge] eliminates mess • Pre-filled with citronella • Reduces annoyance of mosquitoes, gnats and other flying insects • Repels mosquitoes, gnats & other flying insects • Repels annoying insects • Repels biting insects • Perfect for use around deck or patio • Burns up to 12 hours • Burns for hours • [Each] refill burns up to 12 hrs • Use one or more torches in still air • For best results use one or more torches in still air • No-mess, No-hassle • No more mess • Drop-in [citronella] refill [bottle] [canister] [cartridge] • Look for our handy no mess refills • Refillable • Refill [system] • Disposable [bottle][canister][cartridge] • Fuel cartridge]

Optional Marketing Language

[Remove cap, light wick – it's just that easy • It's as easy as one, two... Just remove the cap & light wick. • Pre-filled [drop-in] [bottle] [canister] [cartridge] eliminates mess • The Cutter Insect Repellent Prometheus is the only torch that comes with [drop-in] [bottle] [canister] [cartridge] pre-filled with citronella.

The Cutter Insect Repellent Prometheus torch is an effective and convenient way to protect your family from mosquitoes and other annoying flying insects. Its attractive, contemporary appearance is designed to complement any outdoor décor. [The Cutter Insect Repellent Prometheus torch is perfect for outdoor entertaining.] For best results, use several torches to create a barrier against flying insects. Refill your Cutter torch with our exclusive no-mess, no hassle Cutter Insect Repellent Prometheus [disposable] [refill] [drop-in] [bottle] [canister] [cartridge] [system]. The Cutter Insect Repellent Prometheus [disposable] [refill] [drop-in] [bottle] [canister] [cartridge] [system] makes it easy to keep using your torch throughout the season].

STOP. READ ENTIRE LABEL BEFORE USE [USING.]

FOR OUTDOOR USE ONLY. NEVER LEAVE ANY BURNING TORCH UNATTENDED. UE ONLY CUTTER INSECT REPELLENT PROMETHEUS [DISPOSABLE] [REFILLS] [DROP-IN] [CANISTERS] [CARTRIDGES] TO REFILL TORCH.

2010

DIRECTIONS FOR USE

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

HOW TO USE

Place torch away from other combustibles such as fabrics, dry vegetation, wooden structures, and fuels. To insert the torch into the ground, grasp the torch pole and firmly push tip of pole into the ground until secure. If the torch does not easily penetrate the ground, remove torch cradle. Using a wooden block to protect the end of the torch pole, gently hammer torch pole into the ground until secure. Do not hammer torch into the ground with torch cradle attached. This may weaken or damage the cradle. Replace torch cradle. Remove the child resistant snuffer cap from the [bottle] [canister] [cartridge] to expose the wick. Place the cap in slot on torch cradle. Light the wick. *Always replace the child resistant snuffer cap to extinguish torch and maintain child resistance.*

KEEP OUT OF REACH OF CHILDREN. NEVER LEAVE BURNING TORCHES UNATTENDED. USE ONLY CUTTER INSECT REPELLENT PROMETHEUS [DISPOSABLE] [REFILLS] [DROP-IN] [CANISTERS] [CARTRIDGES] TO REFILL TORCH.

STORAGE AND DISPOSAL

[Text only format may be used if space is small.]

Pesticide Storage: Store in cool dry place. **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 or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

PRECAUTIONARY STATEMENTS**Hazards to Humans and Domestic Animals**

CAUTION. Harmful if swallowed. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco. Avoid contact with skin, eyes and clothing. Contains petroleum hydrocarbons. Do not take internally.

First Aid

[Boxed & bulleted format will be used if space allows.]

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.

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

Note to Physician: Contains petroleum distillate – vomiting may cause aspiration pneumonia.

Physical or Chemical Hazards

Combustible. Do not store near heat or open flame.

Environmental Hazards

To protect the environment, do not allow pesticide to enter or run off into storm drains, drainage ditches, gutters or surface waters. Drift and runoff may be hazardous to aquatic organisms in water adjacent to treated areas.

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 1-800-767-9927 or visit our website at www.spectrumbrands.com

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

EPA Reg. No. 121 – 85 EPA Est. No. 9688–MO-1 ©2009

REFILL PRODUCT CARTON**OPTIONAL MARKETING LANGUAGE**

[Cutter Insect Repellent Prometheus is the only torch that has a drop-in refill system, which eliminates the mess of refueling • Pre-filled [drop-in] [bottle] [canister] [cartridge], eliminates mess.

Refill your Cutter torch with our exclusive no-mess, no-hassle Cutter Insect Repellent Prometheus [disposable] [refill] [drop-in] [bottle] [canister][cartridge]. The Cutter Insect Repellent Prometheus [disposable] [refill] [drop-in] [bottle] [canister] [cartridge] makes it easy to keep using your torch throughout the season.

STOP. READ ENTIRE LABEL BEFORE USE [USING.]

FOR OUTDOOR USE ONLY. NEVER LEAVE ANY BURNING TORCH UNATTENDED. USE ONLY CUTTER INSECT REPELLENT PROMETHEUS [DISPOSABLE] [REFILLS] [DROP-IN] [CANISTERS] [CARTRIDGES] TO REFILL TORCH.

30x60

DIRECTIONS FOR USE

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

HOW TO REFILL [AND USE]

For use in Cutter Insect Repellent Prometheus torches only. Place torch away from other combustibles such as fabrics, dry vegetation, wooden structures, and fuels. Remove the child resistant snuffer cap from the refill canister to expose the wick. Place the cap in slot on torch cradle. Remove the metal flame guard from the torch. Remove the empty [bottle] [canister] [cartridge] and replace with the [new] [refill][drop-in][bottle] [canister] [cartridge] replace the flame guard squarely on the torch. Light the wick. *Always replace the child resistant snuffer cap to extinguish torch and maintain child resistance.*

KEEP OUT OF REACH OF CHILDREN. NEVER LEAVE ANY BURNING TORCH UNATTENDED. USE ONLY CUTTER INSECT REPELLENT PROMETHEUS [DISPOSABLE] [REFILLS] [DROP-IN] [CANISTERS] [CARTRIDGES] TO REFILL TORCH.

STORAGE AND DISPOSAL

[Text only format may be used if space is small]

Pesticide Storage: Store in cool dry place. **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 or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION. Harmful if swallowed. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco. Avoid contact with skin, eyes and clothing. Contains petroleum hydrocarbons. Do not take internally.

First Aid [Boxed & bulleted format will be used if space allows.]

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.

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

Note to Physician: Contains petroleum distillate – vomiting may cause aspiration pneumonia.

Physical or Chemical Hazards

Combustible. Do not store near heat or open flame.

Environmental Hazards

To protect the environment, do not allow pesticide to enter or run off into storm drains, drainage ditches, gutters or surface waters. Drift and runoff may be hazardous to aquatic organisms in water adjacent to treated areas.

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 1-800-767-9927 or visit our website at www.spectrumbrands.com.

Made in the USA for Spectrum,
Division of United Industries Corporation
PO Box 142642
St. Louis, MO 63114-0642
EPA Reg. No. 121 – 85

EPA Est. No. 9688–MO-1

©2009

PRODUCT STICKER

CUTTER
Insect Repellent Prometheus

FOR OUTDOOR USE ONLY

Active Ingredient:
Oil of Citronella 3%
Other Ingredients*97%
*Contains Petroleum Hydrocarbons

KEEP OUT OF REACH OF CHILDREN

CAUTION

See torch for additional precautions.

Net Contents 12 fl oz (354 mL)

7066

DIRECTIONS FOR USE

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

**STOP. READ ENTIRE LABEL ON OUTER PACKAGE BEFORE USING.
NEVER LEAVE ANY BURNING TORCH UNATTENDED.**

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

EPA Reg. No. 121 – 85 EPA Est. No. 9688–MO-1 ©2009

Sub-Label B (Torch Fuel sold in Bottle only)**Optional Marketing Claims**

[Makes You Invisible To Bugs • Easy to use • Reduces annoyance of mosquitoes, gnats and other flying insects • Repels mosquitoes, gnats & other flying insects • Repels annoying insects • Repels biting insects • Perfect for use around deck or patio • Use one or more torches in still air • For best results use one or more torches in still air • Child Resistant Cap • Can be used with all manufacturer's torches]

Optional Marketing Language

[The Cutter Insect Repellent Prometheus torch fuel is an effective and convenient way to protect your family from mosquitoes and other annoying flying insects] [For best results, use several torches to create a barrier against flying insects. Refill your torch with our fuel allowing your torch to be used throughout the season].

STOP. READ ENTIRE LABEL BEFORE USE [USING.]

FOR OUTDOOR USE ONLY. NEVER LEAVE ANY BURNING TORCH UNATTENDED.

[Bracketed Text] = Optional Language

DIRECTIONS FOR USE

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

HOW TO USE

Place torch away from other combustibles such as fabrics, dry vegetation, wooden structures, and fuels.

1. Remove cap.
2. Refill torch according to manufacturer's instructions.
3. Replace [rescue] cap after refilling torch[es].

KEEP OUT OF REACH OF CHILDREN. NEVER LEAVE BURNING TORCHES UNATTENDED.

STORAGE AND DISPOSAL

[Text only format may be used if space is small.]

Pesticide Storage: Store in cool dry place. **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**

CAUTION. Harmful if swallowed. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco. Avoid contact with skin, eyes and clothing. Contains petroleum hydrocarbons. Do not take internally.

First Aid [Boxed & bulleted format will be used if space allows.]

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.

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

Note to Physician: Contains petroleum distillate – vomiting may cause aspiration pneumonia.

Physical or Chemical Hazards

Combustible. Do not store near heat or open flame.

Environmental Hazards

To protect the environment, do not allow pesticide to enter or run off into storm drains, drainage ditches, gutters or surface waters. Drift and runoff may be hazardous to aquatic organisms in water adjacent to treated areas.

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 1-800-767-9927 or visit our website at www.spectrumbrands.com

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

EPA Reg. No. 121 – 85

EPA Est. No. 9688–MO-1

©2009

10046