

121-90

9-28-2007

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

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

SEP 28 2007

Ms. Cheryl H. Prinster  
Regulatory Specialist  
Spectrum  
Division of United Industries Corporation  
PO Box 142642  
St. Louis, Missouri 63114-0642

RE: Cutter Insect Repellent 5KT  
EPA Registration Number: 121-90  
Date of Submission: August 30, 2007

Dear Ms. Prinster:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated August 30, 2007, for the Cutter Insect Repellent 5KT. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action(s) requested fall within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions, please call me directly at 703-305-6249 or Joyce Edwards of my staff at 703-308-5479.

Sincerely;

A handwritten signature in cursive script that reads "Theresa Stone for".

Linda Arrington  
Notifications & Minor Formulations Team Leader  
Registration Division (7505P)  
Office of Pesticide Programs



United States Environmental Protection Agency  
Office of Pesticide Programs (H7505C)  
Washington, DC 20460  
**Application for Pesticide:**

**Registration  
Amendment  
Other**

OPP Identifier Number

**Section I**

1. Company/Product Number 121-90	2. Product Manager Richard Gebken	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Cutter Insect Repellent 5KT	PM# 10	
5. Name and Address of Applicant (include ZIP Code) Spectrum, Division of United Industries Corporation PO Box 142642 St. Louis, Missouri 63114-0642 <input type="checkbox"/> Check if this is a new address	6 <b>Expedited Review.</b> In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labelling to:  EPA Reg. No. _____ Product Name _____	

**Section II**

Amendment - Explain below  
 Resubmission in response to Agency letter dated \_\_\_\_\_  
 Notification - Explain below.

Final printed label in response to Agency letter dated \_\_\_\_\_  
 "ME TOO" Application.  
 Other - explain below

**NOTIFICATION**

SEP 28 2007

**Explanation:** Use additional page(s) if necessary. (For section I and Section II)

Notification per PR Notice 98-10, to correct a typographical error on the label. In the Directions for Use section there is a statement with the heading "When Using Product on Children." The statement reads in part "To apply to a child's face and neck, spray the product into your hands..." This product, Cutter Insect Repellent 5KT, is an insect repellent towelette which cannot be sprayed. In order to correct this error, we are changing "spray" to "wipe" and "into" to "onto".

**Section III**

**1. Material in Which This Product Will Be Packaged:**

Child-Resistant Packaging <input type="checkbox"/> Yes * <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water-Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted.		If "YES," Unit package wgt	No. per container
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		If "YES," Package wgt	No. per container

4. Size(s) of Retail Container

5. Location of Label Directions  
 On Label  
 On Labeling accompanying product

6. Manner in Which Label Is Affixed To Product  
 Lithographed  
 Paper glued  
 Stenciled

**Section IV**

1. Contact Point (Complete items directly below for identification of the individual to be contacted, if necessary, to process this application)

Name Cheryl H. Prinster	Title Regulatory Specialist	Telephone No. (include Area Code) 1-800-242-1166 Ext 2724
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**Certification**  
I certify that the statements I have made on this form and all attachments thereto are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

2. Signature

3. Title  
Regulatory Specialist

4. Typed Name  
Cheryl H. Prinster

5. Date  
August 30, 2007

6. Date Application Received (Stamped)

Front Panel

# CUTTER

## Insect Repellent 5KT

See back panel for Marketing Claims

Active Ingredient:

Picaridin .....	5.75%
Other Ingredients .....	94.25%

KEEP OUT OF REACH OF CHILDREN

**CAUTION** Read cautions on back

Contains 18 [Towelettes] [Wipes]

Total Net Wt 3 oz (85 g)

OPTIONAL MARKETING TEXT

**[Now . . . protection in an odorless formula that feels light and clean! ]**

[Cutter Insect Repellent 5KT contains Picaridin, which provides up to 4 hours [of] protection against mosquitoes [with a light, clean scent!]. This specially formulated repellent also contains Aloe Vera & Vitamin E, leaving your skin feeling soft and smooth. It also provides effective protection against ticks, biting flies, deer flies, gnats, no-see-ums, chiggers and fleas.] Convenient [towelette] [wipe] for easy application.

[Cutter Insect Repellent 5KT with Picaridin is specially formulated for active lifestyles]. [Cutter Insect Repellent 5KT will not damage plastics or other synthetic materials.]

[Because Cutter Insect Repellent 5KT provides protection without the odor [or sticky feeling], you'll forget you're wearing it.

[Clean, Odorless, Effective. Great for everyone in the family]

Cutter Insect Repellent 5KT contains Picaridin, the active ingredient found in the best selling European insect repellent. This repellent provides insect protection without an unpleasant [chemical] odor or greasy skin feel.

[Now, you can apply insect repellent without the smell and oily skin feel reminding you that you're wearing repellent. Cutter Insect Repellent 5KT provides effective insect protection while leaving your skin feeling smooth and smelling clean and fresh.]

[Cutter Insect Repellent 5KT provides up to 4 hours [of] protection against mosquitoes. It also provides effective protection against ticks, biting flies, deer flies, gnats, no-see-ums, chiggers and fleas.]

[Cutter Insect Repellent 5KT with Picaridin is specially formulated for [fishermen, hunters and other Outdoorsmen] [active lifestyles]. [Cutter Insect Repellent 5KT will not damage plastics or other synthetic materials.]

[Because Cutter Insect Repellent 5KT provides protection without the odor, it is perfect for hunters. And now formulated with Picaridin so it will not damage fishing lines or other synthetic materials.]

### NOTIFICATION

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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.

[Directions for canister:]

Remove the lid from the container by pulling upward. Remove the protective foil. Lift flap on lid. Pull up the center [towelette][wipe] and thread the corner of [towelette][wipe] through the open flap in lid; **DO NOT** push finger through lid opening. Replace lid on container. [Towelettes][Wipes] should be pulled at an angle to dispense one at a time. The lid should be tightly closed on container between uses to keep [towelettes][wipes] from drying out. [Alternate directions for a single packet towelette: Tear open foil pack.] Unfold towelette and wipe evenly over exposed skin. Excessive amounts or more frequent reapplication should be unnecessary. Reapply every 3 to 4 hours. Do not apply more than 3 times a day. Do not apply over cuts, wounds, or irritated skin. Do not apply near eyes and mouth. Apply sparingly around ears. When using on children, apply to your own hands and then put it on the child. Use just enough repellent to cover exposed skin. Do not use under clothing. Avoid overapplication of this product. After returning indoors, wash treated skin with soap and water. Wash treated clothing before wearing it again.

**WHEN USING PRODUCT ON CHILDREN:** Do not apply to their hands. To apply to child's face and neck, wipe the product onto your hands and apply to the child. Take care to avoid mouth and eyes and apply sparingly around their ears. Do not allow children to handle the product.

**STORAGE AND DISPOSAL**

**Pesticide Storage:** Store the product in a cool, dry place, out of reach of children.

**Container Disposal: If empty:** Do not reuse this container. Place in trash or 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.** Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Use of this product may cause skin reactions in rare cases.

**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.

Have the product container or label with you when calling a Poison Control Center or doctor, or going for treatment. **Hotline Number:** In case of an emergency call 1-800-767-9927.

**Physical or Chemical Hazards**

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

**NOTICE: 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- 90

EPA Est. No. 9688-MO-1

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**OPTIONAL MARKETING CLAIMS**

1. With Aloe Vera [and] [Vitamin E]
2. Soft on skin, tough on bugs
3. Light feel, strong protection
4. Feels great on you, tough on bugs [too]
5. Pleasant, effective protection [from mosquitoes, chiggers, biting flies, no-see-ums, gnats and fleas]
6. Effective, dependable protection
7. Repels mosquitoes, chiggers, biting flies, no-see-ums, gnats and fleas
8. Repels mosquitoes for hours
9. Repels mosquitoes that may [transmit] [carry] West Nile virus
10. Clean, fresh scent
11. No unpleasant odor [formula]
12. No one will know you're wearing repellent except the bugs
13. Next generation [insect repellent] [formula] (to be used for 6 months from the first date of shipment)
14. Protection for the entire family
15. Repels mosquitoes for up to 4 Hours
16. Not greasy or oily
17. Non-sticky
18. No oily residue
19. Non-staining
20. Innovative formula (to be used for 6 months from the first date of shipment)
21. Bayer technology
22. Won't harm plastics
23. Won't damage synthetic materials
24. Won't damage plastic or synthetic sporting equipment [(fishing line, fishing rods, tackle, gun stocks, tents, rafts, sunglasses)] plastic lenses][sporting equipment]
25. [Insect] protection without the [repellent] odor
26. For active lifestyles
27. Long Lasting Protection from mosquitoes
28. Convenient [towelette] [Wipe] for easy application
29. Easy to apply
30. Wipe on Protection
31. Now available in the U.S. (to be used for 6 months from the first date of shipment)
32. Fragrance free
33. Unscented
34. Contains Picaridin
35. Repels mosquitoes, ticks, [biting flies, deer flies, no-see-ums, chiggers, gnats and fleas] [and other biting insects].
36. Repels deer ticks that may carry Lyme disease
37. A better smelling way to keep bugs [away] [at bay]!
38. Clean, dry feel
39. Light, clean feel
40. Light, Clean, [Odorless]
41. Long Lasting Protection
42. Feels light and clean

# United Industries Corp.

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## NOTIFICATION PER PR NOTICE 98-10

August 30, 2007

Document Processing Desk (NOTIF)  
Office of Pesticide Programs (7504P)  
United States Environmental Protection Agency  
Room S-4900, One Potomac Yard  
2777 South Crystal Drive  
Arlington, VA 22202-4501

Attention: Mr. Richard Gebkin  
Product Manager 10

Subject: **Notification per PR Notice 98-10**  
Cutter Insect Repellent 5KT  
EPA Reg. No. 121-90

Dear Mr. Gebkin:

Please find enclosed notification per PR Notice 98-10, to correct a typographical error on the label. In the Directions for Use section there is a statement with the heading "When Using Product on Children." The statement reads in part "To apply to a child's face and neck, spray the product into your hands..." This product, Cutter Insect Repellent 5KT, is an insect repellent towelette which cannot be sprayed. In order to correct this error, we are changing "spray" to "wipe" and "into" to "onto".

*This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.*

The following documents are enclosed in support of this submission:

1. Application for Pesticide (EPA Form 8570-1)
2. One copy of the proposed label *with changes highlighted*
3. Five copies of the proposed label
4. One copy of the EPA stamped approved label

Please call me at 1-800-242-1166, Ext. 2724 you have questions or need further information. Thank you very much for your attention to our application.

Sincerely,



Cheryl H. Prinster  
Regulatory Specialist

PO BOX 142642, ST. LOUIS, MO 63114-0642  
13260 Corporate Exchange Drive, Bridgeton, MO 63044  
800-242-1166 • 314-253-5907 (fax)