MEMORANDUM

Date: June 16, 1981

Subject: EPA File Symbol: 499-EEN WHITMIRE PERMA-DUST PT 240
Caswell # 109

From: Cheryl A. Peterson
IRB/TSS

To: William Miller
Product Manager (16)

Applicant: Whitmire Research Laboratories, Inc.
3568 Tree Court Industrial Blvd.
St. Louis, MO 63122

Active Ingredients:

Boric Acid.....20%

Inert Ingredients: 80%

Background:

This product is intended as a crack and crevice dust treatment against roaches, ants etc. in hospitals, supermarkets, homes etc. The company has submitted an application for conditional registration of a new product. The "cite-all" method fo support has been indicated, and a particle size study has been submitted in support of the application.

Recommendations:

1. The submitted particle size study is acceptable.

2. An acute inhalation LC50 study would not be considered necessary for this particular product since less than 20% of the aerodynamic equivalent of the product is composed of particulates less than 10 microns indiameter.

3. The primary eye irritation data has not yet been submitted on this product. IRB/TSS defers recommendation for conditional registration of this product until receipt of further information from the applicant.

4.

Review:

The following study was conducted by Seaquist, Div. of Pittway Corp., 1160 N Silver Lake Rd., Cary, IL 60013 for Whitmire Labs on material identified as Powdered Boric Acid. It was received by EPA on 4-29-81, and is in Acc. No. 244950.

→ I have discussed potential inhalation hazards with Mr. Richard Vena of Whitmire. He suggested that the label could carry an instruction for the applicator to wear a respirator, since he may be using the product frequently and both the active & inert

Particle Size Study. Dated: 2-27-81. Study No. ?

Procedure: Particle size analysis was done with both ARC buttons, with and without the extension tube and with the Spra-Max DynaMist button. Mass median diameter of spray particles and percent of spray particles less than 11.86 microns were measured for an aerosol unit equipped with a normal button for broad area treatments in voids (attics, etc.) and an aerosol unit equipped with a void injector for crack and crevice application.

Results:

	Mass MEdian Diameters of Spray Particles	% Spray Particles less than 11.86 microns
Normal aerosol unit for broad areas	60 microns	6.15%
Aerosol with injector for cracks and crevices	125 microns	2.07%

Study Classifbation: Core Supplementary Data (Acceptable as a particle size study).