UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON D C 20460

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MEMORANDUM

Date: October 20, 1980

Subject: EPA File Symbol: 43754-R Bugban Insecticide Lining Paper
Caswell # 539

From: Cheryl Ann Peterson
RRB/TSS

To: Mr. Jay Ellenberger
Product Manager (12)

Applicant: Saxon Industries, Inc.
2401 Morris Avenue
Union, NJ 07083

Active Ingredients:

Arprocarb [2-(1-methylethoxy) phenol methylcarbamate]...0.90%

Inert Ingredients 99.10%

Background:

This product is intended for household use as a shelf and lining paper impregnated with insecticide against roaches, flies etc. The company is applying for conditional registration of a new product. The "cite-all" method of support is being used, and primary eye irritation, acute inhalation and acute dermal studies have been submitted in support of the application. Letter of Authorization for use of data is not present in the jacket.

Recommendations:

1. The primary eye irritation & acute dermal LD50 are acceptable.

2. The acute inhalation LC50 study has been classified Core Supplementary Data because actual chamber concentration measurements taken during the exposure period to determine if chamber concentration of test material was constant during the entire exposure period were not reported.

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3. IRB/TSS would have no objection, on the basis of hazard to man or domestic animals, to the conditional registration of the above product under the "cite-all" method of support with the labeling revisions indicated below.

Labeling:

1. The appropriate signal word is CAUTION, as indicated by the applicant.

2. At the next label printing the statement "It is a violation of Federal law to use this product in a manner inconsistent with its labeling." should be moved up so it appears directly under the heading DIRECTIONS FOR USE.

Review:

The following studies were conducted by Hallowell Laboratories, 151 E. Tenth Ave., Conshohocken, PA 19428 on material identified as an off-white, chalky liquid Bug Ban II for Saxon Industries. They were received by EPA on 7-29-80 , and are in Acc. No. 243614 .

1. Primary Eye Irritation-Rabbits. Dated: May 14, 1980.

   Procedure: 9 NZ albino rabbits received 0.1 ml test material in one eye. 3/9 received an eye wash (unspecified length) beginning 25 sec. after instillation. Observations were made at 24, 48, 72 hours, 4 & 7 days.

   Results: 5/6 unwashed eyes showed minor conjunctivitis with clearing in 4/6 by 72 hrs. 3/3 washed eyes showed no irritation. No corneal opacity.

   Study Classification: Core Guideline Data.

   Product Classification: Tox. Cat. III.

2. Acute Dermal LD50 - Rabbit. Dated: May 28, 1980.

   Procedure: 5M, 5F NZ albino rabbits received 24-hr occluded exposure to 2 g/kg test material. There was a 14-day observation period, with survivor sacrifice and necropsy.

   Results: No mortalities. 2M & 1F showed edema which cleared by Day 2, 2F & 1M showed erythema which cleared by Day 2. LD50 is greater than 2g/kg test material. All animals except one F gained weight during the observation period.

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Study Classification: Core Guideline Data.

Product Classification: Tox. Cat. IV.

The following study was conducted by Product Investigations, Inc., 151 E. 10th Ave., Conshohocken, PA 19428 on material identified as Bug Ban II, an off-white, chalky liquid tested as a 50% w/w soln. in distilled water.

3. Acute Inhalation LC50-Rat. dated: July 2, 1980.

Procedure: 10 Sragué-Dawley rats (unspecified sex) received exposure for 4 hrs to a nominal concentration of 9.02 ml/l test material. In a 721 exposure chamber, diluted test material was generated as an aerosol using an Air Spray Systems nebulizer. Material was filtered through glass wool to remove excessively large particles. A dynamic air flow system was achieved by a vacuum pump exhausting atmosphere through the top of the chamber. Atmosphere concentration was determined nominally while a dual impinged sample yielded particle size analysis through Anderson Cascade Impactor analysis. There was a 14-day dobservation period, with survivor sacrifice and necropsy.

Results: No mortalities. Particle sizes were as follows:

Stage	Net mg	% in Size Range	Cum % Less than Size Range	Size Range in Micromoteb
0	0.5			9.0-10.0
1	1.3	6.5	94.0	5.8- 9.0
2	1.5	6.0	88.0	4.7- 5.8
3	4.8	7.0	81.0	3.3- 4.7
4	7.5	22.3	58.7	2.1- 3.3
5	4.1	34.9	23.8	1.1- 2.1
6	0.6	19.1	4.7	0.7- 1.1
7	0	2.8	1.9	0.4- 0.7
Backup-filter				0 - 0.4

Clinical signs included clear nasal discharge during the first hr. which cleared by Day 2. Necropsy revealed no abnormalities. All animals gained weight during the observation period.

Study Classification: Core Supplementary Data (Actual chamber concentration measurements were not taken during the exposure period from the test chamber to determine if chamber concentration of test material was constant during the entire exposure period).

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Propoxur Toxicology Reviews

Page 4 is not included in this copy.

Pages _____ through _____ are not included in this copy.

The material not included contains the following type of information:

___ Identity of product inert ingredients

___ Identity of product impurities

___ Description of the product manufacturing process

___ Description of product quality control procedures

___ Identity of the source of product ingredients

___ Sales or other commercial/financial information

X A draft product label

___ The product confidential statement of formula

___ Information about a pending registration action

___ The document is a duplicate of page(s) _____