INERT INGREDIENT INFORMATION IS NOT INCLUDED

TSS/IRB SAFETY REVIEW

January 4, 1984

TO: PM 15

SUBJECT: 000422-EAT
Raid Wasp & Hornet Killer IV
S.C. Johnson & Son Inc.
Madison WI 53403

IN TSS: 11-04-83
AC: 161
ACCN: 251660
RN: 108959
OLTS: 38

FORMULATION: Propoxur.....00.475%
DDVP.....00.465
[redacted]

BACKGROUND

This is a submission for a new registration of previously registered combination of active ingredients.

USES

The product is for use as a nest spray for wasps and hornets. Such uses are normally domestic outdoor applications.

SUBMITTED DATA

Accession Number 251660

A. All data from Hazleton Raltech, Madison, WI 53707
Lab #786103 Insecticide 5738D24-2

1. Acute Oral LD_{50}. 5 M and 5 F white albino rats per dose, group housed. Dosage by gavage. 14 day observation period. Results:

Dose, mg/kg	Mortality: Males	%	Females	%	Overall	%
1570	NT	---	0/5	0	0/5	0
3400	NT	---	1/5	20	1/5	20
4200	NT	---	4/5	80	4/5	80
5000	0/5	0	5/5	100	5/10	50

There are insufficient dosages for male rats to permit statistical analysis. For females, the AO LD_{50} is 3790 mg/kg with 95% C.L. of 2710-4540.

Core Minimum Data

TOXICITY CATEGORY III

2. Acute Dermal LD_{50}. 5 M and 5 F white albino rabbits, individually housed. 2 gram product per site. All sites were clipped but not abraded. 14 day observation period. No mortality occured, but some dermal irritation was noted.

Core Minimum Data

TOXICITY CATEGORY III

3. Primary Eye Irritation. 6 NZ white albino rabbits, individually housed. 0.1 ml per eye. Sodium flourescein scan pretest. All eyes unwashed. There was no corneal opacity or iritis in any of the treated eyes. 9/9 treated eyes indicated conjunctival irritation which reversed in all cases within 7 days.

Core Minimum Data

TOXICITY CATEGORY III

4. Primary Eye Irritation. Lab # 786104. 6 NZ white rabbits were sprayed with the product as marketed, for 2 seconds per eye from 10" distance. Sodium flourscein scan pretest. There was no corneal opacity in any of the rabbits. One rabbit had iritis immediately after spraying but this was absent within 24 hours. All animals developed conjunctival irritation which reversed in 7 days.

Supplementary Data

5. Primary Skin Irritation. 6 NZ white albino rabbits, individually housed. All sites clipped but not abraded. 0.5 ml. of material applied per site. 4 hour exposure. PDIS 1.5

Core Minimum Data

TOXICITY CATEGORY IV

6. Release rate. While the actual data were not submitted, the release rate for the aerosol is described as 8-10 g/sec. This is normal for a stream-type wasp and hornet spray.

SUMMARY OF TEST RESULTS

STUDY	RESULTS	TOXICITY CATEGORY
Acute Oral LD50	2710-4540mg/kg	III
Acute Dermal LD50	$\geq$2000 mg/kg	III
Primary Eye Irritation	All clear in 7 days	III
Primary Skin Irritation	PDIS 1.5	III*

*See discussion in Conclusions below.

CONCLUSIONS

1. The product is classified as Tox. III for skin irritation on the basis of not only the PSI test but also the Acute Dermal Toxicity study and the supplementary eye irritation study for which irritation was noted in both. While the PDIS would normally call for a Tox IV classification, the 0.5 ml dosage and the method of administration used in the PSI test may not actually reflect the kind of exposure most likely to cause irritation from a 1,1,1 TCE based high-output aerosol.

2. Normally, acute inhalation is required for domestic use aerosols, but the use of the subject product is most likely to be outdoors, and the delivery system is designed to spray a stream and not a mist. Therefore inhalation data on this product are not necessary for registration.

3. The data are acceptable to permit registration of the product.

LABELLING

1. The submitted data indicate the following changes in the labelling are necessary:

a. To the Directions for Use add: "Do not spray indoors or in poorly ventilated areas."

b. In the Statement of Practical Treatment add the following to the skin statement: Get Medical Attention if Irritation Persists.

c. The statements, "Instant Knock Down" and "Traps and Kills in the Nest" are exaggerated and should be deleted.

d. The claims for larval and pupal control are new for this combination of active ingredients. There are no data on file to substantiate these statements. The submission of data to support these claims should be a condition of registration if the applicant wishes them to remain on the registered label.

Phil Hutton
TSS/IRB