

US EPA ARCHIVE DOCUMENT

12/9/77

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE: November 29, 1977

SUBJECT: Addendum to 11/14/77 memo EPA Registration #499-129
 Caswell #160 (Carbaryl)

FROM: William Dykstra, Ph.D. Toxicology Branch 11/29/77 WSD

TO: Frank Sanders, #12

Action Type: Addendum to Review on Whitmire Tick and Flea Spray

Product Manager: Frank Sanders, #12

Recommendation:

4. It is ^{concluded} ~~recommended~~ that if the current formulated product is packaged in a child-resistant package or enclosure and the ^{appropriate} ~~recommended~~ precautionary statements are placed on the label, the use of the product in domestic or unrestricted situations may be permitted. ~~Although toxicity Category II (Signal word, Warning),~~ Based on the submitted eye irritation studies, ^{the product would be for} requires a restricted use of the product, ~~it is the opinion of the toxicology branch that~~ ^{in the studies,} since the current formulated product is a spray, a total amount of exposure equivalent to the amount of one-tenth of a milliliter, may not reasonably be expected to result from careful use of the spray in accordance with directions on the spray can. Therefore, it is ^{concluded} ~~recommended~~ that the changes of signal words from Caution to Warning, based upon the eye irritation studies, ~~does not necessarily expose the area~~ ^{to protect the} domestic user of the current product to an increased hazard, if the above-stated additions are fulfilled.

However, in the case of the proposed CO₂ formula, the eye irritation studies show that ~~the~~ after 20 seconds exposure, followed by washing, the rabbits' eyes remained irreversibly opaque after seven days. Therefore, the signal word Danger is required and the domestic use of this ^{proposed} product is not supported by the toxicity data. ~~and~~ The use of child-resistant packaging or additional precautionary statements ~~are~~ are not adequate to protect the domestic user of the proposed product.

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