UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE: November 29, 1977
SUBJECT: Addendum to 11/14/77 memo
Caswell #160 (Carbaryl) EPA Registration #499-129
FROM: William Dykstra, Ph.D. 11/19/77
Toxicology Branch
TO: Frank Sanders, #12
Action Type: Addendum to Review on Whitmire Tick and Flea Spray
Product Manager: Frank Sanders, #12

Recommendation:

4. It is recommended that if the current formulated product is packaged in a child-resistant package or enclosure and the appropriate 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, requires a restricted use of the product, it is the opinion of the toxicology branch that since the current formulated product is a spray, a total amount of exposure equivalent to 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 recommended that the changes of signal words from Caution to Warning, based upon the eye irritation studies, do not necessarily expose 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 after 20s 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 product is not supported by the toxicity data. The use of child-resistant packaging or additional precautionary statements are not adequate to protect the domestic user of the proposed product.