SEP 20 1996

DP Barcode: D227078

Case: 031340

MEMORANDUM

Subject: EPA File Symbol/EPA Reg. No.: 432-TOA/Aqua Permanone; Submission of Supplementary Information for Registration

From: Carol E. Glasgow, Ph.D., Toxicologist Carol
Precautionary Review Section
Registration Support Branch (7505W)
Registration Division (7505C)

To: George LaRocca, PM 13
Insecticide-Rodenticide Branch
Registration Division (7505C)

Applicant: AgrEvo Environmental Health
95 Chestnut Ridge Road
Montvale, NJ 07645

FORMULATION FROM LABEL:

Active Ingredient (s):	% by weight
Permethrin	20.0
Piperonyl butoxide, technical	20.0
Inert ingredient(s)	60.0

BACKGROUND: AgrEvo submitted additional information on three studies (acute dermal toxicity, primary eye and dermal irritation) on Aqua Permanone as required in a November 16, 1995 Agency letter. Original studies performed by MB Research Laboratories, Inc. and reviewed by Mrs. Lucy Markarian of PRS on 8/9/95. She rated the acute oral toxicity **Acceptable**, the acute inhalation and the dermal sensitization as **Unacceptable** and three studies **Supplementary** for lack of the following information:

acute dermal toxicity:	areas of application in measured units; the amount of test material applied per cm^2; thickness of gauze used for covering the application site
primary eye irritation:	method of evaluation, i.e., source of light and/or if magnification used
primary dermal irritation:	site and description of patch including thickness of patching material; confirmation of the size of application site; if the test material was applied to the skin directly; a description of the semi-occlusive dressing.

On April 22, 1996, AgrEvo submitted MB Research Laboratories, Inc.'s response with the information Mrs. Markarian had said was missing.

RECOMMENDATION: RSB/PRS findings are as follows:

The additional information is adequate to upgrade the tests from **Supplementary** to **Acceptable**.

TOXICITY PROFILES

Acute oral toxicity	III	Acceptable
Acute dermal toxicity	IV	Acceptable
Acute inhalation toxicity		Unacceptable
Primary eye irritation	IV	Acceptable
Primary dermal irritation	IV	Acceptable
Dermal sensitization		Unacceptable

LABELING: No labeling language will be provided until acceptable acute inhalation and dermal sensitization studies are submitted.

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