MEMORANDUM

SURJECT: EPA Reg. No. 1812-244; Super-Tin 4L*: Griffin Corporation's Requested Change in Precautionary Language Regarding Triphenyltin hydroxide.  

To: Phil Hundemann  
Room 233  
Registration Division (TS-767C)

From: Marion P. Copley, D.V.M.  
Section II, Toxicology Branch  
Hazard Evaluation Division (TS-769C)

THRU: Edwin R. Budd, Section Head  
Section II, Toxicology Branch  
Hazard Evaluation Division (TS-769C)

and  
William L. Burnam, Deputy Branch Chief  
Toxicology Branch  
Hazard Evaluation Division (TS-769C)

H. Gary Hancock of Griffin Corp. has requested a revision in their label for Super-Tin 4L* (see attached letter of January 17, 1985). The Re-registration Standard for products containing triphenyltin hydroxide (TPTH) issued December 20, 1984, requires the following statement be included in the Precautionary Statements, Hazards to Humans (see attached label #1): 

"The United States Environmental Protection Agency has determined that triphenyltin hydroxide causes birth defects in laboratory animals. Exposure to triphenyltin hydroxide during pregnancy should be avoided."

The company proposes to use the following language instead (see attached label #2):

"Women of child-bearing capacity should not handle, mix, or apply products containing triphenyltin hydroxide."

Toxicology Branch (TB) prefers the language required by the Re-registration Standard (label #1) to the proposed change in label #2. All other parts of the labels (with respect to those portions TB ordinarily reviews) are in accordance with the Re-registration Standard for TPTH.
January 17, 1985

Mr. Phil Hundamon
OFFICE OF PESTICIDE PROGRAMS
Crystal Mall #2, Rm 233
1921 Jefferson Davis Highway
Arlington, Virginia 22202

Dear Mr. Hundamon:

Enclosed please find two draft labels of Super-Tin 4L (EPA Reg. No. 1812-244). These labels reflect the revisions required by the Re-registration Standard for Products Containing Triphenyltin hydroxide issued December 20, 1984.

Please note that specimen label marked #2 employs alternate verbage for the advisory to women applicators.

If you have comments or questions, please call me or Jimmy Whatley 912/242-8635. GRIFFIN CORPORATION appreciates your attention in this matter.

Sincerely,

[Signature]

H. GARY HANCOCK
Regulatory Affairs

cc: J. Whatley
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
- A draft product label
- The product confidential statement of formula
- Information about a pending registration action
- FIFRA registration data
- The document is a duplicate of page(s) _________
- The document is not responsive to the request

The information not included is generally considered confidential by product registrants. If you have any questions, please contact the individual who prepared the response to your request.