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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

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FEB 1 1985

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: EPA Reg. No. 1812-244; Super-Tin 4L™; Griffin Corporation's Requested Change in Precautionary Language Regarding Triphenyltin hydroxide.
Tox. Chem. No. 896E

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

FROM: Marion P. Copley, D.V.M. *Marion P. Copley 1/24/85*
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)

*Budd
1/24/85
WLB*

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.

Griffin

January 17, 1985

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

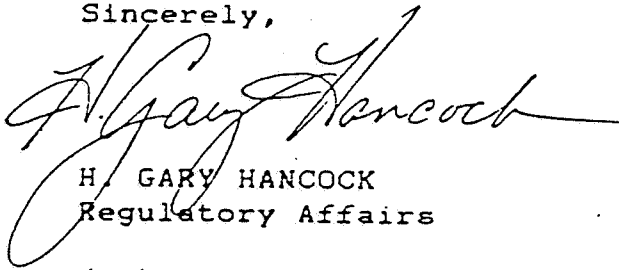
Dear Mr. Hundamon:

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,



H. GARY HANCOCK
Regulatory Affairs

/jst

cc: J. Whatley

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1/18/85*

TPTH toxicology review

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Pages 3 through 4 are not included in this copy.

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
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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.
