MEMORANDUM

SUBJECT: Tetrachlorvinphos Flea and Tick Powders for Cats and Dogs

TO: Mr. George LaRocca, PM 15 Registration Division (H7505C)

FROM: Byron T. Backus, Ph.D. Toxicologist Fungicide/Herbicide/Antimicrobial Toxicology Branch HED (H7509C) 

THROUGH: K. Clark Swentzel Section Head, Review Section II Fungicide/Herbicide/Antimicrobial Toxicology Branch HED (H7509C) 

and

Marciavan Gemert, Ph.D. Branch Chief Fungicide/Herbicide/Antimicrobial Toxicology Branch HED (H7509C)

EPA Record Nos. 253431
Project No. 9-2298
EPA Reg. Nos. 2596-62
Tox. Chem. 217A

Action Requested:

Review additional information relating to significance of cholinesterase inhibition and precautionary statement revisions for pet care products containing Rabon. This submission is an addendum to material which was previously reviewed (see attached copy of a memorandum dated February 21, 1990).

Comments and Recommendations:

1. In the memorandum of February 21, 1990, it was stated that Toxicology Branch 2 accepts, on an interim basis, the revised labeling as proposed by the registrant. Nothing in this
addendum changes this, particularly as the registrant's letter of October 2, 1989 includes the following: "as stated in our letter of September 13, 1989, we suggest that the label for collars meant for use by puppies include an instruction advising against use of the product on puppies less than 6 weeks of age."