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WASHINGTON, D.C. 20460

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OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

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. *Byron T. Backus* 2/16/90
Toxicologist
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THROUGH: K. Clark Swentzel *K. Clark Swentzel* 9/18/90
Section Head, Review Section II
Fungicide/Herbicide/Antimicrobial Toxicology Branch
HED (H7509C)

and

Marcia van Gemert, Ph.D. *M van Gemert* 9/18/90
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."