MEMORANDUM


TOX CHEM No.: 652BB
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FROM: John Doherty
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TO: Linda Arrington/George LaRocca
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THROUGH: Marion Copley, DVM, Section Head
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I. CONCLUSION

Toxicology Branch's original position (HED Document No. 5282, July 9, 1986) regarding the importance of considering the potential exposure to [REDACTED] in assigning the signal word and precautionary statements is considered appropriate for this product. Should OREB determine that there is no exposure to [REDACTED] then the decision to assign the signal word and precautionary statements on the basis of existing toxicity data should be made in Registration Division.

II. Action Requested and Comments

Registration Division is requesting comments from Toxicology Branch I (TB-I) regarding the presence of [REDACTED] (percentage in product not specified) in the product RAID Formula

cc Ellwanger (PRS/RSB/RD - H7505C)
278 Insect Killer (EPA Reg. No.: 004822-00278, manufactured by
the S.C. Johnson Wax Co.). The issue for a potential hazard
associated with the presence of [redacted] in a similar
product (RAID Formula 274, EPA Reg. No.: 004822-00274, the two
products differ in their percentage of permethrin content) was
addressed previously by TB-I (HED Document No. 5282, July 9,
1986).

No new information has been provided to TB-I regarding this
matter although a study (MRID No.: 422098-02) apparently on
potential exposure to the ingredients (assuming the inclusion of
[redacted] has been sent to Occupational and Residential
Exposure Branch for review. Thus, TB-I maintains its original
position that the signal word and precautionary statements for
this product as well as the other product (Formula 274) should be
governed by the presence of [redacted], a caustic agent unless
it can be demonstrated that there will be no exposure to this
material. If no exposure to the [redacted] in this product
can be demonstrated, the decision to assign the product signal
word and precautionary statement should be made in Registration
Division.

III. Note

The new product has the signal word CAUTION and the older
product has the signal word WARNING although the signal word was
based on the same set of data. This is because the criteria for
classifying a product signal word based on eye irritation effects
has changed since the signal word for the older product was
registered. The corneal opacity in the study supporting the
registration of both products was reversed within four days for
most rabbits and within 7 days for a single rabbit. This
condition satisfies the current criteria for a CAUTION signal
word.