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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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RSB/RD

JUN 7 - 1993

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

INERT INGREDIENT INFORMATION IS NOT INCLUDED

MEMORANDUM

SUBJECT: EPA ID# 004822-00278. Permethrin (RAID Formula 278 Insect Killer): Problems associated with [redacted] in the product.

TOX CHEM No.: 652BB
PC No.: 109701
Barcode No.: D190958
Submission No.: S439435

FROM: John Doherty *John Doherty 6/1/93*
Section IV, Toxicology Branch I
Health Effects Division (H7509C)

TO: Linda Arrington/George LaRocca
Product Manager #13
Registration Division (H7505C)

THROUGH: Marion Copley, DVM, Section Head *Marion P. Copley 6/7/93*
Section IV, Toxicology Branch I
Health Effects Division (H7509C)

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

INERT INGREDIENT INFORMATION IS NOT INCLUDED

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

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CC Ellwanger (PRS/RSB/RD - H7505C)



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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.