

US EPA ARCHIVE DOCUMENT

EFFICACY REVIEW

DATE: IN 11-22-88 OUT 1-17-89

FILE OR REG. NO. 1812-GEO

PETITION OR EXP. PERMIT NO. _____

DATE DIV. RECEIVED June 24, 1988 (label claims support) and November 29, 1988 (efficacy study)

DATE OF SUBMISSION June 22, 1988 (label claims support) and November 11, 1988 (efficacy study)

DATE SUBMISSION ACCEPTED _____

TYPE PRODUCT(S): (I) D, H, F, N, R, S _____

DATA ACCESSION NO(S). 409157-01; Record Number: 234571; Action Code: 115

PRODUCT MGR. NO. 17-Hutton/Mendelsohn

PRODUCT NAME(S) RAID Roach Controller II

COMPANY NAME Griffin Corporation

SUBMISSION PURPOSE Provide supporting rationale for various claims stated on the label, including those related to product performance for this new chemical.

CHEMICAL & FORMULATION N-ethyl perfluorooctane sulfonamide 1.0%

(1.04-1.1 g per cm³ bulk density, baits, 12 per 1.0 oz.)

CONCLUSIONS & RECOMMENDATIONS The information provided by S. C. Johnson & Son, Inc. is satisfactory rationale to support the following claims appearing on the front panel of the label: "Odorless Baits" (1. on p. 5), "Advanced Roach Defense System" (3. on p. 5), "Relief from Even Severe Roach Problems" (4. & 5. on p. 10), "Kills Even Hidden Roaches" (6. on p. 10), "Kills Roaches You See, Kills Roaches You Don't See" (6. on p. 10), "Kills Roaches Where They Breed" (7, 8. & 9. on p. 12) and "Kills Roaches Continuously for Up to Three Months" (7. & 8. on p. 12 and Tables 1 and 2 in EPA Accession (MRID) Number 409157-01). While the available toxicity data indicate this chemical has a low order of toxicological effect on mammals and the pattern of use (placement in corner of room at junction of wallboard or along walls and other accessible locations) would appear to preclude use of the regular form of the child hazard warning statement ("Keep Out of Reach of Children"), nevertheless the undesirable possibility of a child ingesting an entire bait is something which should be addressed on the label. The modified child hazard warning statement ("Do Not Allow Children or Pets to Play with the Baits") may very well prove unenforceable if the entire bait enclosure is an attractive nuisance and of a size to permit swallowing.

RL Vern L. McFarland, IRB

1