MEMORANDUM

SUBJECT: PC CODE 129032

TO: Barbara Madden
Risk Characterization and Analysis Branch
Health Effects Division 7509C

FROM: Mark I. Dow, Ph.D., Section Head
Special Review and Registration Section II

THRU: Larry C. Dorsey, Chief
Occupational & Residential Exposure Branch
Health Effects Division 7509C

Following, please find OREB's review of:

DP Barcode: 220284

Registration Numbers: 37425-FL-1-Adams Flea and Tick Mist....
56493-, Ptenocide Pet Spray; 270-XXX, Farnam Purge Plus
Insecticide.

As requested, OREB has reviewed the proposed labels noted above. The question posed is, "Does OREB anticipate there will be prolonged exposure to human skin?" Due to the nature of the suggested use pattern, OREB cannot say with certainty that there will not be prolonged exposure to human skin. It is not so much a question of exposure due to the application but due to the activity patterns of some persons and their pets.

Since some of the directions for application indicate the pet should be dampened with spray mist, even though not to the point of run-off, some persons would be expected to have prolonged contact with the material. "Prolonged" is obviously highly subjective but since many people sleep with their pets and are in rather constant contact with their pets, there is the possibility of extended contact.

However, since the amount of active ingredient seems to be rather small in the containers noted, the significance of "prolonged contact" is questionable. Unless there are rather remarkable tox concerns for this material, it would seem that a 90 day dermal study is probably not warranted.
The material not included contains the following type of information:

___ Identity of product inert ingredients.
___ Identity of product impurities.
___ Description of the product manufacturing process.
___ Description of quality control procedures.
___ Identity of the source of product ingredients.
___ Sales or other commercial/financial information.
___ A draft product label.
___ The product confidential statement of formula.
___ Information about a pending registration action.
___ FIFRA registration data.
___ The document is a duplicate of page(s) ________.
___ The document is not responsive to the request.

The information not included is generally considered confidential by product registrants. If you have any questions, please contact the individual who prepared the response to your request.