

MEMORANDUM

Date: June 16, 1981

Subject: EPA File Symbol: 499-EEN WHITMIRE PERMA-DUST PT 240
Caswell # 109

From: Cheryl A. Peterson *CP*
IRB/TSS

To: William Miller
Product Manager (16)

Applicant: Whitmire Research Laboratories, Inc.
3568 Tree Court Industrial Blvd.
St. Louis, MO 63122

Active Ingredients:

Boric Acid.....20%

Inert Ingredients: 80%

Background:

This product is intended as a crack and crevice dust treatment against roaches, ants etc. in hospitals, supermarkets, homes etc. The company has submitted an application for conditional registration of a new product. The "cite-all" method of support has been indicated, and a particle size study has been submitted in support of the application.

Recommendations:

1. The submitted particle size study is acceptable.
2. An acute inhalation LC50 study would not be considered necessary for this particular product since less than 20% of the aerodynamic equivalent of the product is composed of particulates less than 10 microns in diameter.
3. The primary eye irritation data has not yet been submitted on this product. IRB/TSS defers recommendation for conditional registration of this product until receipt of further information from the applicant.

4.

Review:

The following study was conducted by Seaquist, Div. of Pittway Corp., 1160 N Silver Lake Rd., Cary, IL 60013 for Whitmire Labs on material identified as Powdered Boric Acid. It was received by EPA on 4-29-81, and is in Acc. No. 244950.

→ I have discussed potential inhalation hazards with Mr. Richard Vena of Whitmire. He suggested that the label could carry an instruction for the applicator to wear a respirator, since he may be using the product frequently and with the active ingredient.
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Particle Size Study. Dated: 2-27-81. Study No. ?

Procedure: Particle size analysis was done with both ARC buttons, with and without the extension tube and with the Spra-Max DynaMist button. Mass median diameter of spray particles and percent of spray particles less than 11.86 microns were measured for an aerosol unit equipped with a normal button for broad area treatments in voids (attics, etc.) and an aerosol unit equipped with a void injector for crack and crevice application.

Results:

	Mass Median Diameters of Spray Particles	% Spray Particles less than 11.86 microns
Normal aerosol unit for broad areas	60 microns	6.15%
Aerosol with injector for cracks and crevices	125 microns	2.07%

Study Classification: Core Supplementary Data (Acceptable as a particle size study).