



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

December 2, 2005

MEMORANDUM:

Subject: EPA Reg. No.: 432-1209/R & M Garden Dust 5%
DP Barcode: 323657
Case No.: 0080

From: Marianne Lewis, Biologist
Product Reregistration Branch
Special Review and Reregistration Division (7508C)

Marianne Lewis 12/2/05

To: Karen Jones, CRM
Product Reregistration Branch
Special Review and Reregistration Division (7508C)

Applicant: Bayer Environmental Science
95 Chestnut Ridge Road
Montvale, NJ 07645

FORMULATION FROM EPA Reg. No. 432-1209 LABEL:

	<u>% by wt.</u>
<u>Active Ingredient(s):</u>	
Carbaryl	5.0%
<u>Inert Ingredient(s):</u>	<u>95.0%</u>
Total	100.0%

BACKGROUND: In the 8 month response to the Carbaryl RED, the registrant is citing acute toxicity studies to support the reregistration of their product, EPA Reg. No. 432-1209. The MRID's are as follows: 405845-01 (81-1), 405845-02 (81-2), 417204-01 (81-3), 405845-04 (81-4), 405845-03 (81-5), 415603-01 (81-6). Five (81-1, 81-2, 81-3, 81-4, 81-5) of the studies were conducted by Bushy Run Research Center. The skin sensitization study (81-6) was conducted by Springborn Laboratory. The test material used in each of the studies was EPA Reg. No. 264-429. These studies were reviewed by PRB/SRRD concurrent with this review. On 10/18/05 the registrant requested and was granted permission by PRB/SRRD to cite the above studies to support the reregistration of EPA Reg. No. 432-1209.

RECOMMENDATIONS:

- Four (81-1, 81-2, 81-5, 81-6) of the cited studies are acceptable to support the reregistration of EPA Reg. No. 432-1209.
- The acute inhalation study (81-3) cited is unacceptable. However, based on information contained in the study and in the open literature, the Agency will classify the subject product as Toxicity Category IV. A new study is not needed.
- The primary eye irritation study (81-4) cited is unacceptable. However, based on the information available the Agency will classify this product as Toxicity Category IV. A new study is not needed.

The acute toxicity profile for EPA Reg. No. 432-1209 is currently:

Acute Oral	III	Acceptable
Acute Dermal	III	Acceptable
Acute Inhalation	IV	Unacceptable
Primary Eye	IV	Unacceptable
Primary Dermal	IV	Acceptable
Skin Sensitization	non sensitizer	Acceptable

NOTE: The acute toxicity requirements have been satisfied for the subject product.

LABELING:

ID #: 000432-01209 R & M GARDEN DUST 5%

SIGNAL WORD: CAUTION

HAZARDS TO HUMANS AND DOMESTIC ANIMALS:

Harmful if swallowed. Harmful if absorbed through skin. Avoid contact with eyes, skin, or clothing. Wear long sleeved shirt and long pants, shoes, socks, and chemical resistant gloves (such as or made out of any waterproof material, selection category A).

FIRST AID:

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-xxx-xxxx for emergency medical treatment information.

USER SAFETY RECOMMENDATIONS:

User should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.

User should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

Note to CRM/PM/Registrant:

The proposed label should contain a Note to Physician which addresses the presence of a cholinesterase inhibitor. The following statements are some suggested types of information that

could be included, if applicable, in the Note to Physicians:

- technical information on symptomatology;
- use of supportive treatments to maintain life functions;
- medicine that will counteract the specific physiological effects of the pesticide;
- company telephone number to specific medical personnel who can provide specialized medical advice.