UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

November 23, 2005

MEMORANDUM:

Subject: EPA Reg. No.: 432-1237/BES Garden Dust 10%
DP Barcode: 323686
Case No.: 0080

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

Marianne Lewis 11/23/05

To: Venus Eagle, CRM
Product Reregistration Branch
Special Review and Reregistration Division (7508C)

Applicant: Bayer Environmental Science
P.O. Box 12014, 2 T.W. Alexander Dr.
Research Triangle Park, NC 27709

FORMULATION FROM EPA Reg. No. 432-1237 LABEL:

	% by wt.
Active Ingredient(s):	
Carbaryl.....	10.0%
Inert Ingredient(s):	90.0%
Total	100.0%

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BACKGROUND: In the 8 month response to the Carbaryl RED, the registrant has cited acute toxicity studies to support the reregistration of EPA Reg. No. 432-1237. The MRID's are as follows: 419191-01 (81-1), 466856-16 (81-2), 466856-19 (81-5), 466856-20 (81-6). Two (81-2, & 81-5) of studies were conducted by SafePharm Labs. The acute oral study (81-1) was conducted by Stillmeadow, Inc. The skin sensitization study (81-6) was conducted by CIT. The test material used in each of the studies was EPA Reg. No. 264-333. In response to a rebatching request PRB/SRRD on 10/18/05 determined that the subject product could cite these four studies conducted with EPA Reg. No. 264-333.

On 10/18/05, the Agency determined that an acute inhalation study (81-3) and a primary eye irritation study (81-4) must be conducted on EPA Reg. No. 432-1237 due to the inerts.

RECOMMENDATIONS:

- Three (81-1, 81-2, 81-5) of the cited studies are acceptable to support the reregistration of EPA Reg. No. 432-1237.
- The skin sensitization study (81-6) cited is unacceptable. However, based on information found in the open literature, the Agency will classify the subject product as a non sensitizer. A new study is not needed.

The acute toxicity profile for EPA Reg. No. 432-1237 is currently:

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

NOTE: The labeling will be completed upon receipt of the required information.

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