

Memorandum

Date: 10 August 1982

Subject: EPA Reg. No. 239-2475 ORTHO CHINCH BUG KILLER
Caswell #845A

From: B. T. Backus
IRB/TSS

To: Mr. William Miller
Product Manager 16

Registrant: Chevron Chemical Co.
Ortho Consumer Products Division
940 Hensley St.
Richmond, CA 94804-0036

Active Ingredients:

0,0,0,0-Tetrapropyl dithiopyrophosphate.....	13%
Deodorized Kerosene.....	76%
Inert Ingredients:.....	11%

Background:

The question exists as to whether an adequate inhalation LC50 study for this product exists which can be used to satisfy the requirement for reregistration. A review (Backus, Oct. 11, 1979) of an inhalation study (SOCAL 1095/28:102) dated Feb. 13, 1978, originally classified this study as acceptable.

Comments and Recommendations:

1. In the study (SOCAL 1095/28:102) dated Feb. 13, 1978 subjects were exposed to an average nominal concentration calculated as 37.17 mg/L (22.3 g test material into 300 liters of air ÷ 2), or more than 20 mg/L.

The major difficulty with this study in terms of current data requirements is that no measurements were made as to actual (as opposed to nominal) concentration of the product (and/or the actives) to which the subjects were exposed. The study is therefore not acceptable as an inhalation LC50 study to support the reregistration of the subject product.

2. We would be willing to consider the use of the acute inhalation LC50 studies conducted by Stauffer on the technical material as supporting data for the reregistration of this end-use product.
3. The remaining studies (acute oral LD50, acute dermal LD50, primary dermal and eye irritation) in Acc. 241027 are acceptable for reregistration purposes.

Byron T. Backus 08/10/82
Byron T. Backus/IRB-TSS