Memorandum

Date: 14 May 1982

001880

Subject : EPA File Symbol: 432-ANL 26% SBP-1382-2 E.C.
Caswell #83E

From: B. T. Backus
IRB/TSS

To: Mr. Franklin Gee
Product Manager 17

Applicant: Penick Corp.
Pesticide Technology Department
215 Watchung Ave.
Orange, NJ 07050

Active Ingredients:

Resmethrin	26.00%
Related compounds	3.54%
Aromatic petroleum hydrocarbons	64.42%
Inert Ingredients:	6.04%

Background:

Product is proposed for insect control in and around homes and other sites. Applicant has submitted acute oral LD50, acute dermal LD50, primary eye and dermal irritation studies.

Comments and Recommendations:

1. The appropriate signal word is WARNING, based on potential eye exposure hazard.

2. The specific gravity (0.923) indicates an aspiration hazard exists for this product if it is swallowed. This should be addressed in the labeling.

3. IRB/TSS would have no objection on the basis of hazards to humans and domestic animals to the conditional registration of this product for the proposed uses with the labeling revisions indicated below.

Labeling:

1. The appropriate signal word is WARNING, based on potential eye exposure hazard.

2. The "Keep Out of Reach of Children" should appear above the signal word.

3. The Hazards to Humans and Domestic Animals statement should be revised to something like:

WARNING: Harmful if swallowed or absorbed through skin. May cause eye irritation. Avoid contact with skin, eyes or clothing. Avoid breathing mist. Remove or cover aquariums before spraying.

4. We would prefer "Statement of Practical Treatment" to "First Aid," although the latter is acceptable.

5. There should be an IF SWALLOWED statement of practical treatment, something like:

   IF SWALLOWED: Call a Physician or Poison Control Center. Do not induce vomiting because of aspiration hazard.

6. The additional statements of practical treatment should be something like:

   IF IN EYES: Flush with plenty of water. Get medical attention.

   IF ON SKIN: Wash off with soap and water.

7. "Keep out of lakes, streams and ponds." should be revised to: "Do not apply directly to water."

Review:

The following studies were conducted by MB Research Laboratories, Inc. P.O. Box 178, Spinnerstown, PA 18968. Studies were received at EPA 2-24-82 and are in Acc. 247490.

1. Acute Oral LD50 - Rat. Project No. MB 81-5630A; dated 11-24-81.

   Procedure: 5M, 5F Wistar rats received an oral dosage of 5 g/kg, with subsequent 14-day observation.

   Results: 1M, 1F died on day 2. Symptoms (seen in survivors) included lethargy, diarrhea, piloerection, ataxia, chromorhinorrhea, chromodacryorrhea, urinary incontinence, brown staining of muzzle and urogenital areas, and tremors. Survivors gained weight. Oral LD50 greater than 5 g/kg (chance that 2 or fewer animals would die if LD50 is 5 g/kg is about 5.5%). Necropsies of animals which died showed congested lungs, red stomachs and intestines.

   Study Classification: Core Minimum Data

   Product Classification: Tox. Cat. IV

2. Acute Dermal LD50 - Rabbit. Project No. MB 81-5630B; dated 11-24-81.

   Procedure: 5M, 5F albino rabbits received a 24-hr occluded dermal exposure to 2 g/kg of test material, with subsequent 14-day observation.

   Results: No mortalities. Diarrhea, lethagy and yellow nasal discharge noted in some rabbits. 9/10 had gained weight by end of observation period; one had lost weight. Dermal LD50 above 2 g/kg.

   Study Classification: Core Minimum Data

   Product Classification: Tox. Cat. III

3. Primary Eye Irritation - Rabbit. Project No. MB 81-5630D; dated 11-24-81.

   Procedure: 0.1 ml was applied to one eye of each of 9 rabbits; 3 eyes were flushed with water for one minute starting 20-30 seconds after instillation. Remaining 6 eyes were unwashed.

   Results: All eyes showed some irritation on day 7; 0/3 washed, 4/6 unwashed had some corneal involvement on day 7. Slight conjunctival irritation still present in all unwashed eyes on day 14, but no corneal involvement. Washed eyes were clear by day 14.

   Study Classification: Core Minimum Data (study carried out only to 14 days)

   Product Classification: Tox. Cat. II

4. Primary Dermal Irritation - Rabbit. Project No. MB 81-5630C; dated 11-24-81.

   Procedure: 0.5 ml was applied to 4 sites (2 intact, 2 abraded) on each of 6 rabbits, with 4-hr occluded dermal exposure.

   Results: PDIS = 2.28 (average of scores at 4 hrs, 24 hrs and 72 hrs.

   Study Classification: Core Minimum Data

   Product Classification: Tox. Cat. III

Byron T Backus 05/14/82

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