

5-3-82

Subject: Resmethrin

To : Dr. Faunter, Chief
Toxicology Branch, HED

Dr. Devries of S. B. Penick Corporation has raised two questions concerning data requirements for resmethrin.

1. Is there a need for a 90-day subchronic inhalation study for resmethrin, TECHNICAL?
2. For a 3% end-use resmethrin formulation (label attached) is a 21-day inhalation study required?

The Company wants answers to the above in order to plan their future research for resmethrin. It is their understanding that these tests may not be needed.

I would appreciate a response at your earliest convenience. 5/3/82

Thanks,

John - Please take care of this. Thank you,

Franklin D. Gee
X 7-2690

BEST AVAILABLE COPY

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CROSS FIRETM

SBP-1382® 3% MULTIPURPOSE SPRAY

(Contains 0.2 pounds of SBP-1382 per gallon or 24 grams of SBP-1382 per litre)

FOR INDOOR USE IN ULV, MECHANICAL MISTING
 SPRAYERS, OR THERMAL FOGGERS
 FOR HOMES, STORES, INSTITUTIONS, RESTAURANTS,
 FOOD PROCESSING PLANTS, WAREHOUSES, INDUSTRIAL
 INSTALLATIONS, AND HORSE STABLES

ACTIVE INGREDIENTS:

*1-resmethrin (5-(phenylmethyl)-3-furanylmethyl 2,2-dimethyl-3-(2-methyl-1-propenyl)cyclopropanecarboxylate ...	3.00% w/w
Related compounds	0.41
Aromatic petroleum hydrocarbons	3.97
Petroleum distillate	92.50
INERT INGREDIENTS:	0.12
	100.00%

*Cis/trans isomers ratio: max. 30% (±) cis and min. 70% (±) trans.
 U.S. Patent Nos. 3,465,007 and 3,542,928.
 *Penick's SBP-1382® brand of resmethrin Insecticide.
 Penick Corp., 1050 Wall Street West, Lyndhurst, N.J. 07071.

TM Penick Corporation Trademark

KEEP OUT OF REACH OF CHILDREN
CAUTION
 SEE SIDE PANEL FOR ADDITIONAL
 PRECAUTIONARY STATEMENTS

EPA Reg. No. 432-547 : : : : EPA Est. 43875-NJ-1
 NET CONTENTS 1 GALLON (3.79 LITRES)

PENICK Penick Corporation

1050 Wall Street West, Lyndhurst, NJ 07071 USA

**PRECAUTIONARY STATEMENTS
 HAZARDS TO HUMANS**

CAUTION

Harmful if swallowed. Avoid breathing vapor. Avoid contact with skin, eyes, or clothing. Wear mask or respirator of type recommended by NIOSH (National Institute for Occupational Safety and Health) to give adequate protection against this material. Wear protective clothing. Wash exposed skin with soap and water after handling and before eating. Wash all contaminated clothing with soap and water, separately from other clothing, before re-use.

FIRST AID

In case of contact, immediately flush skin and eyes with plenty of water for at least 15 minutes. For skin and eyes, call a physician.

PHYSICAL OR CHEMICAL HAZARDS

Extinguish open flame before space spraying. This formulation is combustible. **DO NOT USE, POUR, SPILL, OR STORE NEAR HEAT OR OPEN FLAME.**

ACCEPTED

JUL 3 0 1980

Under the Fungicide, and Plant Growth Regulator Act, as amended, for the pesticide registered under EPA Reg. No. 432-547

STORAGE AND DISPOSAL

Prohibitions: Do not contaminate water, food or feed by methods of storage or disposal. Open dumping is prohibited unless in an EPA approved landfill.

Pesticide Disposal: Pesticide, spray mixture, or rinsate that cannot be used or chemically reprocessed should be disposed of in a landfill approved for pesticides, or buried in a safe place away from water supplies.

Container Disposal: Properly identify all used containers. Triple rinse (or equivalent) and offer for recycling, reconditioning or disposal in approved landfill, or bury in a safe place. A container size of 30 gals. (114 litres) or more may be resealed and offered for reconditioning.

General: Consult federal, state or local disposal authorities for approved alternate procedures.

WARRANTY STATEMENT

Our recommendations for use of this product are based upon tests believed to be reliable. The use of this product being beyond the control of the manufacturer, no guarantee, expressed or implied, is made as to the effects of such or the results to be obtained if not used in accordance with directions or established safe practice. The buyer must assume all responsibility including injury or damage, resulting from its misuse as such, or in combination with other materials.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

This concentrate is designed for use undiluted in ULV sprayers such as the LECO Mini ULV or Micro-Gear which give particles of aerosol size. It can also be diluted with oils which meet Food Additive Regulation (21 CFR 121.1182) for use in mechanical fogging equipment such as the Microsol or Challenger machines which give larger particles. It can also be diluted with oil as specified and applied as a contact spray.

In food handling areas, food should be removed or covered previous to treatment. All food processing surfaces should be covered or thoroughly cleaned before using. Apply only when facility is not in operation.

Before application, remove plants and animals from area to be treated. Remove horses before spraying stables.

For ULV use in mechanical aerosol generators such as the LECO Mini ULV or Micro-Gear: Apply undiluted at the rate of 0.5 fl. oz. (14.9 ml) of concentrate per 1000 cubic feet (28.3 cubic meters) of space. Direct output from aerosol generator upward toward upper corners of room and ceiling. This undiluted spray may be applied in facilities operating under USDA poultry, meat, rabbit and egg products inspection program.

Extinguish all flames in the area to be treated. Shut off all air conditioning or ventilating equipment.

Vacate room before application. Leave closed for one hour after spraying. Ventilate room thoroughly before reentry.

Space Spray: To kill adult and accessible stages of insect pests of stored foods: grain weevils, flour beetles, saw-toothed grain beetles, Angoumois grain moths, Mediterranean flour moths, Indian meal moths, grain mites, carpet beetles and spider beetles. Direct output into corners, under pullets, hitting as many of the insects as possible, and then treat as a space spray upward toward upper corners of room and ceiling. To kill houseflies, mosquitoes and gnats treat as a space spray directing output toward upper corners of room and ceiling.

Contact Spray: Use undiluted to kill roaches, silverfish earwigs, ants, spiders, crickets, centipedes, sowbugs, millipedes, carpet beetles. Apply the spray as a coarse wet spray into all cracks and crevices in woodwork, walls, floors, beneath sinks and other insect harborage, contacting as many insects as possible.

To kill wasps and hornets, contact application should be made in late evening when insects are at rest. Spray liberally into hiding and nesting places, contacting as many insects as possible. Repeat as necessary.

For mechanical misting equipment such as the Microsol or Challenger Machine:

Diluting instructions: Dilute to 0.5% SBP-1382 by adding 1 fl. oz. (29.6 ml) of the 3.0% concentrate to 5 fl. oz. (148 ml) of petroleum distillate. Dilute to 0.25% SBP-1382 by adding 1 fl. oz. (29.6 ml) of the 3.0% concentrate to 11 fl. oz. (325 ml) of petroleum distillate. Dilute to 0.20% SBP-1382 by adding 1 fl. oz. (29.6 ml) of the 3.0% concentrate to 14 fl. oz. (414 ml) of petroleum distillate. Dilute to 0.10% SBP-1382 (which would be used for flying insects only) by adding 1 fl. oz. (29.6 ml) of the 3.0% concentrate to 29 fl. oz. (858 ml) of petroleum distillate.

For most effective results against flying insects, operate spraying dispenser adjusted to deliver a fine mist. For flying insects, use either 0.10% or 0.25% SBP-1382.

To kill houseflies, mosquitoes, gnats, wasps, hornets, and small flying moths: Close all doors and windows. Point nozzle upward, direct the spray mist to all parts of the room, especially windows and other light sources which attract these insects. Fill the room with mist, then leave the treated area. Keep the room closed for at least 15 minutes. Ventilate the room before reentry. Repeat as necessary.

To kill crawling insects, adjust spray to produce large wetting type spray particles and use either 0.25% or 0.50% SBP-1382.

To kill roaches, earwigs, grain mites, sowbugs, spiders, silverfish, crickets, centipedes and grain insects (adult and accessible stages of confused flour beetles, red flour beetles, saw-toothed grain beetles, shiny spider beetles, carpet beetles, grain weevils, Angoumois grain moths, Indian meal moths). Spray thoroughly into hiding places such as cracks, crevices, moist areas, openings around pipes and sinks, under refrigerators, baseboards, storage areas, and other insect harborage. Spray directly on insects where possible. Repeat as necessary.

To kill wasps and hornets: Contact application should be made in late evening when the insects are at rest. Spray liberally into hiding and nesting places contacting as many insects as possible. Repeat as necessary.

To kill ants: Spray trails, nests and points of entry. Spray on ants where possible. Repeat as necessary.

Thermal Applications Indoors: Use 0.20% SBP-1382 for the control of houseflies, mosquitoes and gnats in warehouses, restaurants and industrial institutions. Shut off ventilating systems, air ducts, air conditioning equipment and close off room or area to be treated.

Extinguish all flames and pilot lights. Apply as a dry fog at the rate of 1-1/3 fluid ounces (39.3 ml) per 1000 cubic feet (28.3 cubic meters) of space. Direct nozzle of thermal applicator toward the upper corners of the room and along the ceiling. Close off room for at least one-half hour. Do not remain in treated areas. Ventilate the area before reentry.

I. Representative Existing Uses: (General Category (s)):

a. Direct application to pets (cats and dogs) to control fleas and ticks.

b. For Indoor Use in ULV,
Mechanical Misting Sprayers or Thermal Foggers

For use in food processing plants, milk handling areas of milk, cheese and ice cream plants, bakeries, breweries, bottling plants, grain mills, warehouses, boxcars, stores, institutions, homes, and horse stables, not for application if horses will be used for food.

c. In automatic timed dispenser during "After Hours," and total release.

d. For public health, plant protection and quarantine pests found on aircraft.

e. For use indoors and outside premises of hotels, motels, homes, food handling establishments, packaging and processing plants, seed houses, commercial, industrial, office, institutional and storage buildings, milk handling areas of milk plants, milk storage rooms, egg processing plants, supermarkets, restaurants, bottling plants, canneries, flour and feed mills, bakeries, boats, ship cabins and hospitals. In hospital, patients should be removed prior to treatment. Also for use in buses, automobiles, trucks, boxcars and ship cargo holds. Also for use in dog kennels, patios and paved areas.

f. Used by mosquito abatement districts, public health officials and other trained personnel in mosquito control programs.

g. Outdoors to protect ornamental plants.

h. For manufacture use only.

II. Similar Uses are Pending

III. Tolerance(s)

No tolerances have been established for the subject chemical, however, the following petitions are pending.

a. 9F2209

Request to be exempted from the requirement of tolerance in or on raw agricultural commodities when used according to label directions for mosquito control on feedlots, croplands, pastures and rangelands.

b. 9H5210
432-547

For use in food items resulting from its use in food handling establishments.

IV. Present Label Precautions

PRECAUTIONARY STATEMENTS HAZARD TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Harmful if swallowed or absorbed through skin. Avoid breathing vapors or spray mist. Avoid contact with skin and eyes. In case of contact, immediately flush eyes or skin with plenty of water. Obtain medical clearance if irritation persists.

Do not apply directly to food. In commercial food handling facilities, cover or remove any food and food processing equipment during application. Do not apply while food processing is underway. After space spraying in meat packing plants, bakeries and other food processing plants, wash all equipment, benches, shelving, etc. where exposed food will be handled, with potable water. In the home, all food processing surfaces and utensils should be covered during treatment, or thoroughly washed before use.

Remove pets, birds and cover fish aquariums before spraying.

PHYSICAL OR CHEMICAL HAZARDS

Do not store near heat or open flame.

Contents under pressure. Do not use or store near heat or open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

DIRECTIONS FOR USE

GENERAL CLASSIFICATION

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

STORAGE AND DISPOSAL

v. See attached representative labels for further details.