



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

APR 8 1993

OFFICE OF
PESTICIDES AND TOXIC
SUBSTANCES

MEMORANDUM

SUBJECT: Amdro; Maxforce Roach Control Gel; Protocol for Dermal Penetration Study and Copy of Response to American Cyanamid's Questions Regarding Inhalation and Dermal Exposure Studies; ID #064248-00005; Chemical #118401 (Hydramethylnon)

Tox.Chem No.: 642AB
MRID No.: None
DP Barcode No.: D185774
Submission No.: S432069

TO: George LaRocca, PM #13
Insecticide-Rodenticide Branch
Registration Division (H7505C)

FROM: William Dykstra, Ph.D., Toxicologist
Review Section I
Toxicology Branch I *William Dykstra 3/30/93*
Health Effects Division (H7509C)

THRU: Roger Gardner, Section Head, Toxicologist
Review Section I
Toxicology Branch I *Roger Gardner 3-30-93*
Health Effects Division (H7509C) *K/A 3/31/93*

ACTION REQUESTED: As stated in the related action (DP Barcode No. D185361)

With respect to Cyanamid's waiver request from an inhalation exposure requirement, TB-I concludes that this requirement can be waived. With respect to the request to defer the dermal application exposure requirement, TB-I defers to Mr. Bruce Kitchens of OREB. Mr. Kitchens orally communicated to TB-I that this requirement can be deferred until after the completion of the dermal penetration study.

Additionally, the results of the dermal penetration study with the 2% Gel can be used as surrogate data to support the registered and proposed uses of the 0.88% granular formulation.

With respect to this current action, Toxicology Branch-I (TB-I) has been requested to review the rat dermal penetration study with the 2% Gel, which will be performed at Bushy Run Research Center for the Clorox Corporation.

CONCLUSIONS: The Dermal Absorption Study protocol by Bushy Run Research Center was reviewed by Dr. Robert Zendzian of HED (Dr. Zendzian's concurrence is attached) and found to be acceptable without any changes.