

Memorandum

Date: 17 ^{November 1981} ~~October~~ 1981

Subject: EPA File Symbol: 499-EEN WHITMIRE PERMA-DUST PT 240
Caswell #109

From: B. T. Backus
IRB/TSS

To: Mr. William Miller
Product Manager 16

Applicant: Whitmire Research Laboratories, Inc.
3568 Tree Court Industrial Blvd.
St. Louis, MO 63122

Active Ingredient:
Boric Acid.....20%
Inert Ingredients:.....80%

Background:

Product is in toxicity category I on the basis of effects seen in an eye irritation study (Acc. 294309 previously reviewed by C. Peterson July 20, 1981). The applicant (letter of October 8, 1981) has requested that a recommended statement: "Causes irreversible eye damage" be revised to "Corrosive, causes eye damage."

Comments and Recommendations:

1. Corrosivity implies irreversible destruction of eye tissue, and is the worst case eye exposure effect possible (see the attached sheet from Policy and Criteria Notice 2161.2 dated March 31, 1981). This product is not invariably corrosive, since less than half the rabbits actually showed corneal opacity at 21 days.
2. We could accept, for this product, "May cause irreversible eye damage" or "May cause eye damage" in lieu of "Causes irreversible eye damage." "Corrosive" appears to be inappropriate.
3. We would prefer that the Storage and Disposal Statement follow the complete set of DIRECTIONS FOR USE (i.e., that it appear immediately after: "For application ideas for both food and non-food areas, follow the Whitmire Roach Location Chart and Pest Management Manuals.").

Byron T. Backus 11/17/81
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