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BACKGROUND ICI Americas, Inc. has submitted revised labeling for review. The product is VAPAM [EPA Reg. No. 10182-229], a residential use soil fumigant solution, and the active ingredient is Sodium methyldithiocarbamate. A response to deficiencies concerning a dermal sensitization study [MRID# 401966-01] submitted by the registrant has been requested by PM 21, however, the registrant has failed to provide the appropriate information. The remaining acute toxicity data supporting registration of this product is under EPA accession number 263846.

#### RECOMMENDATION

[1] Upon further review, the unacceptable dermal sensitization study [MRID# 401966-01] has been found acceptable and graded core guideline. The product, VAPAM, is considered a dermal sensitizer by PRS. A response to deficiencies concerning this study is not required.

#### LABELING

[1] The appropriate signal word is WARNING.

[2] The precautionary statements should read as follows:

May be fatal if absorbed through skin. Causes skin and eye irritation. Harmful if swallowed or inhaled. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Do not get in eyes, on skin, or on clothing. Wear protective clothing and rubber gloves, and avoid breathing spray mist. Wash thoroughly with soap and water after handling and before eating or smoking. Remove contaminated clothing and wash before reuse.

[3] The statements of practical treatment should read as follows:

IF ON SKIN: Wash with plenty of soap and water. Get medical attention.

IF SWALLOWED: Call a physician or poison control center. Drink promptly a large quantity of milk, egg whites, gelatin solution, or if these are not available drink large quantities of water. Induce vomiting by touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person. Avoid alcohol. Get medical attention.

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IF INHALED: Remove victim to fresh air. If not breathing give artificial respiration, preferably mouth to mouth. Get medical attention.

IF IN EYES: Flush with plenty of water. Call a physician if irritation persists.

\*NOTE TO PM: Due <sup>to</sup> dermal toxicity, this product meets the criteria for restricted use classification, ~~and is not a restricted use product.~~ The PM should decide if the label contains sufficient alternative labeling language to offset this hazard and the need for restricted use classification.

~~\*NOTE TO PM: The directions for use recommend the use of sprinkling cans and hose-end sprayers for product application. These application methods would likely result in dermal exposure. The PM should decide how to address this problem.~~

\*NOTE TO PM: The statement "Do not apply directly to water or wetlands" appears on this label. According to a recent memo from Ann Lindsay [4-25-91], this statement should be replaced with "Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark."

#### ACUTE TOXICITY PROFILE

Acute Oral.....	Category 3/Guideline
Acute Dermal.....	Category 2/Minimum
Acute Inhalation.....	Category 3/Guideline
Eye Irritation.....	Category 3/Guideline
Dermal Irritation.....	Category 2/Guideline
Dermal Sensitization.....	Positive /Guideline

\* Note To P.M.: Due to dermal toxicity, this product meets the criteria for restricted use classification.