

12/9/77

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE: November 29, 1977

SUBJECT: Addendum to 11/14/77 memo EPA Registration #499-129  
Caswell #160 (Carbaryl)

FROM: William Dykstra, Ph.D. 11/29/77 WBD  
Toxicology Branch

TO: Frank Sanders, #12

Action Type: Addendum to Review on Whitmire Tick and Flea Spray

Product Manager: Frank Sanders, #12

Recommendation:

4. It is <sup>concluded</sup> ~~recommended~~ that if the current formulated product is packaged in a child-resistant package or enclosure and the ~~recommended~~ <sup>appropriate</sup> precautionary statements are placed on the label, the use of the product in domestic or unrestricted situations may be permitted. ~~Although toxicity Category II (Signal word, Warning),~~ Based on the submitted eye irritation studies, ~~requires a restricted use of the product, it is the opinion of the toxicology branch that~~ Since the current formulated product is a spray, a total amount of exposure equivalent to the amount in the studies, one-tenth of a milliliter, may not reasonably be expected to result from careful use of the spray in accordance with directions on the spray can. Therefore, it is <sup>concluded</sup> ~~recommended~~ that the changes of signal words from Caution to Warning, based upon the eye irritation studies, ~~does not necessarily expose the~~ <sup>are</sup> ~~to an increased hazard, if~~ <sup>adequate</sup> to protect the domestic user of the current product, ~~to an increased hazard, if~~ the above-stated additions are fulfilled.

However, in the case of the proposed CO<sub>2</sub> formula, the eye irritation studies show that ~~the~~ after 20 seconds exposure, followed by washing, the rabbits' eyes remained irreversibly opaque after seven days. Therefore, the signal word Danger is required and the domestic use of this <sup>proposed</sup> product is not supported by the toxicity data. ~~and~~ The use of child-resistant packaging or additional precautionary statements ~~are~~ are not adequate to protect the domestic user of the proposed product.