

Memorandum

Date: 7 January 1983

Subject: EPA Reg. No. 26693-2 KILLMASTER II
Caswell 219AA

From: B. T. Backus
IRB/TSS

To: Mr. Jay Ellenberger
Product Manager 12

Registrant: Positive Formulators, Inc.
1044 N. Jerrie Ave.
Tucson, AZ 85711

Active Ingredients:

Chlorpyrifos [O,O-diethyl O-(3,5,6-trichloro
2-pyridyl) phosphorothioate].....2.0%
Aromatic petroleum derivative solvent.....1.2%
Petroleum distillate.....95.2%
Inert Ingredients:.....1.6%

Background:

Labeling currently includes the statement "Restricted Use Pesticide," with attendant stipulations. The registrant is requesting (letter of Dec. 27, 1982) that this statement be replaced with "To Be Applied Only By or Under the Supervision of Pest Control Operators, Public Health Organizations, and Other Trained Personnel Responsible for Insect Control Programs."

Comments and Recommendations:

1. The acute toxicity studies which were used to support this registration indicated this product is in toxicity category III with respect to oral LD₅₀, dermal LD₅₀, and dermal irritation. Although these studies were conducted at Industrial Bio-Test, the results are what could reasonably be expected from an extrapolation of the toxicity of the technical actives.
2. According to our review records of the eye irritation study, 3/6 subjects had corneal opacity at 24 hrs and 2/6 had corneal opacity at 48 hrs, with opacity being reversible in 7 days. It is not certain from this review whether or not all irritation had cleared within 7 days. If all eyes were clear by 7 days, then by current classification criteria this product would be in toxicity category III by this exposure route, and the appropriate signal word would be CAUTION.

3. Since there is some uncertainty as to the classification of this product based on eye irritation potential (part of this uncertainty is because the study was conducted at IBT), the signal word WARNING should be retained. However, the registrant should consider having another eye irritation study conducted on this product because of the possibility that the appropriate signal word is, in actuality, CAUTION.
4. IRB/TSS would have no objection, on the basis of hazards to humans and domestic animals, to the proposed replacement of "Restricted Use Pesticide" by "To Be Applied Only By or Under the Supervision of Pest Control Operators, Public Health Organizations, and Other Trained Personnel Responsible for Insect Control Programs," provided the additional labeling revision indicated below is also made.

> Labeling:

1. A statement similar to: "Get medical attention." should be added following "Immediately flush eyes with plenty of water." in the statement of practical treatment.

Byron T. Backus 01/07/83

Byron T. Backus
IRB/TSS