



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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

June 27, 2002

MEMORANDUM

Subject: Acute Toxicity Review for EPA Reg. No.: 74771-R/ Benefect
DP Barcode: D282229 Disinfectant

To: Adam Heyward, PM 34 / Laverne Dobbins
Regulatory Management Branch
Antimicrobials Division (7510C)

From: Ian Blackwell, Biologist *Ian Blackwell*
Efficacy Evaluation Team
Product Science Branch
Antimicrobials Division (7510C)

Through: Karen Hicks, Team Leader *Karen Hicks*
Chemistry and Toxicology Team
Product Science Branch
Antimicrobials Division (7510C)
6/27/02

Michele E. Wingfield, Chief
Product Science Branch
Antimicrobials Division (7510C)

Applicant: Sensible Life Products, Division of Laid Back Designs, Ltd.

FORMULATION FROM LABEL:

<u>Active Ingredient(s):</u>	<u>% by wt.</u>
Thyme oil (thymol principal ingredient)	0.52
<u>Other Ingredient(s):</u>	99.48
Total:	100.00%



BACKGROUND: Sensible Life Products has submitted information to support the acute toxicity requirements for their product, Benefect Disinfectant, EPA File Symbol 74771-R. This submission does not include any (reports of) actual acute toxicity studies.

This submission includes a supporting discussion of the toxicology of the individual ingredients used in Benefect Disinfectant. The MRID Number is 456380-02. This 3/14/2002 document includes a CSF of 74771-R and Material Safety Data Sheets (MSDS) for the ingredients of this product.

A waiver is requested for the acute oral, acute dermal and acute inhalation toxicity, primary eye, primary skin irritation and dermal sensitization studies. The registrant notes that a waiver is requested for these studies as the active ingredient in Thymol as present in Thyme oil. Thyme oil is recognized under FIFRA as a minimum risk pesticide. (See 40 CFR §152.25 [g].) The MSDSs of the other ingredients verify that they do not pose a toxicological concern.

RECOMMENDATIONS: PSB findings are:

PSB/AD does not actually consider this request to be for a data waiver, the information included in this submission does not meet Agency criteria for acute toxicity data waivers. However, PSB/AD will allow Sensible Life Products to cite the acute toxicity and primary irritation data presented in MRID Number 456380-02. Semantics aside, the registrant will not have to submit acute toxicity or primary irritation studies to support 74771-R.

The acute toxicity profile for File Symbol 74771-R is currently:

acute oral toxicity	IV	Cited
acute dermal toxicity	IV	Cited
acute inhalation toxicity	IV	Cited
primary eye irritation	IV	Cited
primary skin irritation	IV	Cited
dermal sensitization	IV	Cited

LABELING:

The signal word is "CAUTION". (This is a minimum requirement on all EPA registered pesticide products.)

No Precautionary Statements are required.

No First Aid Statements are required.

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