



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

217A
CASWELL FILE

FEB 21 1990

OFFICE OF
PESTICIDES AND
TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Tetrachlorvinphos Flea and Tick Powders, for Cats
and Dogs

TO: Mr. George LaRocca, PM 15
Registration Division (H7505C)

FROM: Byron T. Backus, Ph.D. *Byron T. Backus 2/12/90*
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THROUGH: K. Clark Swentzel *K. Clark Swentzel 2/12/90*
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and

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EPA Record Nos. 253014, 253012

Project No. 9-2242

EPA Reg. Nos. 2596-78, 2596-79

Tox. Chem. 217A

Action Requested:

Review precautionary statement revisions for these products. In the cover letters the registrant has noted that the reregistration document states that domestic use dusts should include the statement: "Wear long-sleeved shirt and pants, shoes and socks." It is the registrant's belief that "this statement is more appropriate for agricultural domestic use products rather than pet products." The registrant is proposing a statement for washing hands and exposed skin after use.

Comments and Recommendations:

1. Given the use patterns for these products (application on cats, dogs, their bedding, and living quarters), the recommendation for wearing protective clothing is inappropriate, particularly as the pets, after treatment, will be coming into contact with furniture and other members of the household. On an interim basis, Toxicology Branch 2 accepts the revised labeling as proposed by the registrant.
2. Tetrachlorvinphos has been identified as a carcinogen in mice, and has been classified in Category C by the Peer Review Committee. The upper bound potency estimate (Q*) obtained from the mouse study was 3.14×10^{-3} (mg/kg/day)⁻¹. There is no indication from the records in the Caswell files that a risk assessment has been calculated for human exposure associated with Tetrachlorvinphos use on pets, or even what the level of exposure from these uses would be. NDEB may be able to calculate this exposure, or, alternatively, determine whether the registrant should provide data. In addition, part of the risk assessment would involve using the findings from a dermal absorption study which was requested in the Registration Standard for Tetrachlorvinphos. There is no indication in the Caswell files that this study has been received and/or reviewed.
3. When the information indicated above is available, a risk assessment should be conducted for human exposure associated with use of Tetrachlorvinphos in dog and/or cat flea and tick powders.