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MEMORANDUM:

Subject: EPA File Symbol/EPA Reg. No.: 8329-UN Biomist 1.5 + 7.5
ULV

From: Mark Perry, Biologist
Precautionary Review Section
Registration Support Branch
Registration Division (H7505C)

MJP
11-14-91

To: George LaRocca, PM 13
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Registration Division (H7505C)

Thru: Thomas C. Ellwanger, Section Head
Precautionary Review Section
Registration Support Branch
Registration Division (H7505C)

E 11/14/91

Applicant: Clarke Mosquito Control Products CO., Inc.
159 N. Garden Avenue, P.O. Box 72288
Roselle, IL 60172

FORMULATION FROM LABEL:

	<u>% by wt.</u>
<u>Active Ingredient(s):</u> Permethrin (3-Phenoxyphenyl)methyl (+/-) cis, trans-3-(2,2-dichlorethenyl)-2,2- dimethylcyclopropanecarboxylate.....	1.50
Technical Piperonyl Butoxide	7.50
<u>Inert Ingredient(s):</u>	91.00
Total:	100%

CBI

BACKGROUND

Clarke Mosquito Control Products is claiming substantial similarity between the subject product, Biomist 1.5 + 7.5 ULV (EPA Reg. No. 8329-UN), and Biomist 4+20 ULV (EPA Reg. No. 8329-38). According to each label and CSF, the product formulations are as follows:

Biomist 1.5+7.5 ULV

Permethrin (3-Phenoxyphenyl)methyl (+/-) cis, trans-3-(2,2-dichlorethenyl)-2,2-dimethylcyclopropanecarboxylate..... 1.50%
Technical Piperonyl Butoxide 7.50%



Biomist 4+20 ULV

Permethrin (3-Phenoxyphenyl)methyl (+/-) cis, trans-3-(2,2-dichlorethenyl)-2,2-dimethylcyclopropanecarboxylate..... 4.00%
Technical Piperonyl Butoxide 20.00%



RECOMMENDATION

Since [redacted] is the only ingredient present in larger amounts in the subject product than in the cited product, PRS considers Biomist 1.5+7.5 ULV (8329-UN) and Biomist 4+20 ULV (8329-38) to be substantially similar. Therefore, the acute studies under the EPA Reg. No. 8329-38 support the registration of EPA Reg. No. 8329-UN. The MRID numbers of the supporting studies are 414933-02 through 414933-06, except inhalation which has not been assigned an MRID number.

LABELING

- (1) The appropriate signal word is CAUTION.
- (2) The precautionary statements should read as follows:

Harmful If absorbed through skin or inhaled. Avoid contact with skin, eyes or clothing. Avoid breathing spray mist. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.
- (3) The statements of practical treatment should read as follows:

INERT INGREDIENT INFORMATION IS NOT INCLUDED

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

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

LABELING NOTE: The "If Swallowed" and "If In Eyes" statements on the current label are acceptable, however, these statements must appear after the "If Inhaled" and "If On Skin" statements.

ACUTE TOXICITY PROFILE

Acute Oral*.....	Category 4/Guideline
Acute Dermal*.....	Category 3/Guideline
Acute Inhalation*.....	Category 3/Guideline
Eye Irritation*.....	Category 4/Minimum
Dermal Irritation*.....	Category 4/Guideline
Dermal Sensitization*.....	Negative /Minimum

* See O. Odiott Review (8-3-90)