



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

AUG 12 1994

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: MAXFORCE™ Professional Insect Control Roach Killer Bait Gel; EPA Registration No. 64248-5; Request for Review for General Use

Tox.Chem No.: 642AB
MRID No.: None
DP Barcode No.: D196781
Submission No.: S453454

TO: Rame Cromwell, PM Team #13
Insecticide-Rodenticide Branch
Registration Division (H7505C)

FROM: William Dykstra, Ph.D., Toxicologist
Review Section I
Toxicology Branch I *William Dykstra 8/8/94*
Health Effects Division (H7509C)

for **THRU:** Roger Gardner, Section Head, Toxicologist
Review Section I
Toxicology Branch I
Health Effects Division (H7509C)

Pamela M. Hurley

8/8/94

*KB
8/10/94*

ACTION REQUESTED: In a November 4, 1993 letter from the Registrant, Clorox, a request is made to render an opinion on the acceptability of using a consumer version of the MAXFORCE™ Professional Insect Roach Killer Bait Gel in the consumer market. Toxicology Branch-I (TB-I) is requested to respond to the letter.

CONCLUSIONS: The Toxicology Branch (TB-I) has examined the request to extend the use of MAXFORCE™ Gel to the general consumer market. It appears from the letter that the label would generally remain the same as for the professional use except that the consumer version of the gel would be available in 30 or 45 gram



syringes rather than the 60 gram PCO version. TB-I is unable to provide a definitive opinion on this request at this time until a risk assessment for this particular use can be conducted. However, TB-I is concerned that in a general household use situation, **children may inadvertently ingest hydramethylon.** Therefore, TB-I suggests that if registration for this particular use is to be pursued, the Registrant seriously consider child-resistant packaging of the applicator syringe, especially if it to be used more than once and will be stored somewhere in the home. As an additional deterrent to accidental exposure by children, the Registrant may want to consider adding a foul tasting inert into the gel and putting "Mr. Yuk" on the label and syringe of the product.