

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

10/24/91

MEMORANDUM

SUBJECT: Hydrogenated Castor Oil as an Inert Ingredient

FROM: Robert Forrest, Product Manager 14
Insecticide-Rodenticide Branch
Registration Division (H7505C)

TO: Virginia Dietrich
SRRD (H7508W)

We recently received an inquiry from The Tanglefoot Company regarding their products Bird Tanglefoot Pressurized (EPA Registration No. 1621-16) and Tanglefoot Bird Repellent (EPA Registration No. 1621-17). Mr. J. Skendzel, the company president, said he had talked to you about the inert status of Hydrogenated Castor Oil in these two products, and that you wanted a determination from RD as to whether or not this should be classed as inactive during the reregistration process. As indicated by the attached accepted labels, we have accepted Hydrogenated Castor Oil as being an inactive ingredient in these products, and it should be considered an inert ingredient for reregistration. One of the products (1621-16) was not properly coded into our Pesticide Products Information System (PPIS) and, therefore, was still listed as an active. We have sent this product for coding today, and it should soon be off of our computer system.

If you have any additional questions, contact Bill Erickson at 557-4408.

CONCURRENCES

SYMBOL							
SURNAME							
DATE							

5705603 10/21/91 204

RECORD OF COMMUNICATION

PHONE CALL DISCUSSION FIELD TRIP CONFERENCE
 OTHER (SPECIFY)

(Record of item checked above)

TO:
Bill Erickson
Team 14

FROM:
Joe Skendzel, President
The Tanglefoot Co.

DATE 10/21/91
TIME 9:45 AM

SUBJECT
Status of Hydrogenated Castor Oil as an Inert Ingredient in
Products 1621-16 and 1621-17

SUMMARY OF COMMUNICATION

Mr. Skendzel had talked to Virginia Dietrich of SRRD about reregistration of these products. Ms. Dietrich was unclear whether or not Hydrogenated Castor Oil was an active or inactive ingredient. Our computerized PPIS has it listed as an active for 1621-16 but not for 1621-17, although both products contain this ingredient.

Our examination of the files for these products indicates Hydrogenated Castor Oil is an inactive ingredient. The last accepted labels for 1621-16 (May 11, 1989) and 1621-17 (November 29, 1988) list only Polybutenes as the active ingredient in these products.

CONCLUSIONS, ACTION TAKEN OR REQUIRED

A memo was sent to Virginia Dietrich on 10/24/91 to inform her that Team 14 considers this ingredient to be inactive in these products.

A copy of the memo was also sent on 10/24/91 to Mr. Skendzel of The Tanglefoot Company.

The jacket for 1621-16 was sent on 10/24/91 to SIG for recoding of Hydrogenated Castor Oil as an inactive ingredient.

INFORMATION COPIES

TO: