



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

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

Wednesday, March 16, 2005

MEMORANDUM

Subject: Acute Toxicity Review for EPA Reg. No.: 1448-UGE / BCMW  
DP Barcode: D313223

To: Velma Noble, PM 31/ Drusilla Copeland  
Regulatory Management Branch  
Antimicrobials Division (7510C)

From: Ian Blackwell, Biologist  
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Through: Karen Hicks, Team Leader  
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Applicant: Buckman Laboratories, Inc.

FORMULATION FROM LABEL:

|                              |                 |
|------------------------------|-----------------|
| <u>Active Ingredient(s):</u> | <u>% by wt.</u> |
| Ammonia                      | 7.59            |
| <u>Other Ingredient(s):</u>  | <u>92.41</u>    |
| Total:                       | 100.00%         |

- 1) **BACKGROUND:** Buckman Laboratories, Inc., has submitted a request to cite acute toxicity data to support their product, 1448-UGE/ "BCMW". The data being cited was conducted on Buckman's product, File Symbol 1448-UGG/ Busan 1215. CTT/PSB/AD conducted an acute toxicity review of that product on 3/11/2005. The results of that review were:

| Acute Toxicity Profile for 1448-UGG/ Busan 1215 |             |                   |            |
|---|-------------|-------------------|------------|
| Study   | MRID Number | Toxicity Category | Status     |
| Acute Oral Toxicity                             | 464351-08   | IV                | Acceptable |
| Acute Dermal Toxicity                           | 464351-09   | IV                | Acceptable |
| Acute Inhalation Toxicity                       | 464351-10   | IV                | Acceptable |
| Primary Eye Irritation                          | 464351-11   | IV                | Acceptable |
| Primary Skin Irritation                         | 464351-12   | IV                | Acceptable |
| Dermal Sensitization                            | 464351-13   | Nonsensitizer     | Acceptable |

According to the CSF of EPA File Symbol 1448-UGG, it is simply a re-pack of 1448-UGE.

- 2) **RECOMMENDATIONS:** PSB findings are:

- a) The cited studies are acceptable to support the acute toxicity data requirements of 1448-UGE.

The acute toxicity profile for File Symbol 1448-UGE is currently:

| Acute Toxicity Profile for 1448-UGE/ "BCMW" |             |                   |        |
|---|-------------|-------------------|--------|
| Study                                       | MRID Number | Toxicity Category | Status |
| Acute Oral Toxicity                         | 464351-08   | IV                | Cited  |
| Acute Dermal Toxicity                       | 464351-09   | IV                | Cited  |
| Acute Inhalation Toxicity                   | 464351-10   | IV                | Cited  |
| Primary Eye Irritation                      | 464351-11   | IV                | Cited  |
| Primary Skin Irritation                     | 464351-12   | IV                | Cited  |
| Dermal Sensitization                        | 464351-13   | Nonsensitizer     | Cited  |

3) LABELING:

- a) The signal word is "Caution".
- b) Due to the acute toxicity profile (all category IV and nonsensitizer), no precautionary labeling is required.