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

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MEMORANDUM

DATE: November 25, 1980

SUBJECT: EPA Registration No. 1769 - EII
National Chemsearch Fenocil Weed Killer: Caswell#

FROM: Deloris F. Graham DGA 12/1/80
FHB/TSS E 12/15/80

TO: Richard Mountfort
Product Manager (23)

Applicant: National Chemsearch
2727 Chemsearch Boulevard
Irving, Texas 75062

Active Ingredients:
Heavy aromatic naphtha.....83.10%
Bromacil (5-bromo-3-sec-butyl-6-methyluracil.....2.47%
Trichloroacetic acid.....8.62%
Inert Ingredients:.....5.80%

Background: Submitted an Acute Oral, Acute Dermal, Primary Dermal and Eye Irritation studies. "Cite-All" method of support. These studies were conducted by Hill Top Research, Inc. These data are under accession number 243444. An Acute Inhalation Study was not submitted.

Recommendations:

1. The Acute Oral, Acute Dermal, Primary Dermal and Eye Irritation studies are acceptable to support the conditional registration of this product.

2. FHB/TSS has no objections to the conditional registration of this product, provided the labeling revisions noted below are made.

3. Please see enclosed copy of labeling procedures and format.

Label:

1. As indicated by the Eye Irritation Study, the appropriate signal word is DANGER.

2. The preferred placement of the statement "Keep Out of Reach of Children" is preceeding the signal word.

3. The precautionary statements must preceed "Directions For Use" on side panel.

4. The precautionary statement must be revised similar to the following:

> Corrosive. Causes eye and skin damage. Do not get in eyes, on skin, or on clothing. Wear goggles or face shield and rubber gloves when handling. May be harmful if swallowed. Do not breathe vapor or spray mist.

5. The statement of practical treatment must be revised similar to the following:

> In case of contact, immediately flush eyes with plenty of water for at least 15 minutes; wash skin with soap and water and get medical attention. Remove and wash contaminated clothing before reuse.

6. Under the heading "ENVIRONMENTAL HAZARDS," the statement "Keep out of lakes, streams, or ponds," must be revised to the following:

> "Do not apply directly to lakes, ponds, or streams."

Review:

1. Acute Oral Toxcity Study: Hill Top Research, Inc., P.O. # 73657; June 19, 1980.

   Procedure: 5M and 5F Sprague-Dawley rats received a 5g/kg dose of the test material. Observations were made frequently during exposure and at least twice daily thereafter for 14 days. Necropsies were performed on all animals.

   Results: No mortalities. Animals gained weight. No signs of toxicity during the 14-day observation period. No abnormalities at necropsy. LD_{50} was determined to be greater than 5g/kg.

   Study Classification: Core Guideline Data.

   Toxicity Category: IV - CAUTION

2. Acute Dermal Toxicity Study: Hill Top Research, Inc., P.O. #73657; June 19, 1980.

   Procedure: A 2.0 g/kg dose of the test material was applied to the abraded skin of 10 New Zealand white rabbits weighing between 2490 to 2870 grams. The animals were placed under occlusive wrap for 24 hour exposure period. Observations were made at the end of the 24 hour exposure period and daily thereafter for 14 days. Gross necropsy performed on all animals. Body weights recorded.

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Results: No mortalities. Animals gained weight. Erythema, edema, atonia, desquamation and nasal discharge were observed. No abnormalities observed at necropsy. LD_{50} was determined to be greater than 2.0 g/kg.

Study Classification: Core Guideline Data.

Toxicity Category: III - CAUTION

3. Eye Irritation Study: Hill Top Research, Inc, P.O. # 73657; June 19, 1980.

Procedure: 9 New Zealand white rabbits received a 0.1 ml dose in the left eye. The treated eyes of 6 rabbits were not rinsed, the treated eyes of 3 rabbits were rinsed 30 seconds after instillation for 60 seconds with lukewarm tap water. Observations were made at 24, 48, and 72 hours, 4 and 7 days after treatment.

Results: Unwashed group - at 24 hours, 6/6 had moderate to severe corneal opacity (1/6 = 20, 3/6 = 30, 1/6 = 40, 1/6 = 60) and persisted in 5/6 through day 7. 6/6 animals had iris irritation (6/6 =5). 6/6 animals had conjunctival redness (6/6 = 3), swelling (3/6 = 2, 2/6 = 3, 1/6 = 4) and discharge (6/6 = 2). Iris irritation and conjunctival irritation persisted through day 7.

Washed group - at 24 hours, 3/3 animals had moderate to severe corneal opacity (2/3 = 20, 1/3 = 40) and persisted in 1/3 animals through day 7. 3/3 animals had iris irritation (3/3 = 5). 3/3 animals had conjunctival redness (3/3 = 3), swelling (1/3 = 1, 2/3 =2) and 2/3 discharge (2/3 =2). Iris irritation and conjunctival irritation persisted through day 7.

Study Classification: Core Guideline Data.

Toxicity Category: I - DANGER

4. Dermal Irritation Study: Hill Top Research, Inc., P.O. # 73657; June 19, 1980.

Procedure: A 0.5 ml dose was applied to 6 New Zeland white rabbits at 2 abraded and 2 intact skin sites per animal. These animals were placed under occlusive wrap for 24 hour exposure periods. Observations were made at the end of the 24 hour period and at 72 hours after treatment.

Results: At 24 hours, slight to severe erythema and edema. At 72 hours, severe erythema and edema. Other symptoms observed included necrosis, fissuring and entire site whitened. Primary Irritation Score was 5.48.

Study Classification: Core Guideline Data.

Toxicity Category: II - WARNING

Heavy aromatic naphtha toxicology review

Page _____ is not included in this copy.

Pages 5 through 7 are not included in this copy.

The material not included contains the following type of information:

___ Identity of product inert ingredients

___ Identity of product impurities

___ Description of the product manufacturing process

___ Description of product quality control procedures

___ Identity of the source of product ingredients

___ Sales or other commercial/financial information

X A draft product label

___ The product confidential statement of formula

___ Information about a pending registration action

___ FIFRA registration data

___ The document is a duplicate of page(s) _____

___ The document is not responsive to the request

The information not included is generally considered confidential by product registrants. If you have any questions, please contact the individual who prepared the response to your request.
