

00-770
TR-2812

DATE: February 10, 1982

SUBJECT: EPA Registration Number 538-155
Turf Builder Plus Halts

002812

FROM: Deloris F. Graham *EJG 2/10/82*
FHB/TSS *E 2/12/82*

TO: Robert Taylor
Product Manager

Applicant: O. M. Scott & Sons Company
Attention: Michael P. Kelty
Marysville, OH 43041

Active Ingredient:
S-(0,0-Diisopropyl phosphorodithioate) ester of
N-(2-Mercaptoethyl) benzenesulfonamide 3.58%

Inert Ingredients 96.42%

Background:

Submitted eye irritation data to support change in signal word from "WARNING" to "CAUTION." ^{category II} Based on the eye irritation data as reviewed by Byron T. Backus, July 1979. The eye irritation studies being submitted now were conducted by WARF Institute and Raltech Scientific Services. Data under accession number 538-155. Alternate method of support.

Recommendation:

- (1) FHB-TSS finds these studies acceptable to support the change in signal words.
- (2) The appropriate signal word is "CAUTION."

Label:

- (1) The statement "Do not contaminate feed or foodstuffs. Do not graze treated treated areas. Do not feed clippings to livestock" must be deleted from precautionary statements and placed under "Directions For Use."
- (2) The "Storage and Disposal" statements must appear in "Directions for Use."

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Review:

(1) Eye Irritation Study: WARF Institute, Study #8020765.

Procedure: Nine rabbits received 0.1 g of the test material in one eye each. Twenty seconds after instillation, the eyes of three of the rabbits were washed. Observations made at 24, 48, 72 hours, and 7 days.

Results: At 24 hours, 1/6 of the unwashed group and 1/3 of the washed group had corneal opacity (1/6=10)(1/3=5); 6/6 and 2/3 redness (1/6=1, 5/6=2)(2/3=2); 5/6 and 2/3 chemosis (3/6=1, 2/6=2)(1/3=1, 1/3=2); 4/6 and 1/3 discharge (1/6=1, 2/6=2, 1/6=3)(1/3=2). Sloughing of corneal epithelium observed.

At 72 hours, 1/3 corneal opacity (1/3=20); 3/6 redness (1/6=1, 2/6=2); 2/6 chemosis (2/6=2).

At day 7, no corneal opacity in washed or unwashed group; 1/6 had redness (1/6=2).

Study Classification: Core Guideline Data.

Toxicity Category: III - CAUTION.

(2) Eye Irritation Study. Raltech Scientific Services; February 14, 1978.

Procedure: Only total scores submitted. Protocol not attached.

Results: Determination of toxicity category could not be made.

Study Classification: Core Supplementary. Procedure and individual scores from each animal must be submitted.

(3) Eye Irritation Study: WARF Institute; Study #8021357.

Procedure: Nine rabbits received 0.1 g of the test material in one eye each. Twenty seconds after instillation, the eyes of three of the rabbits were washed for one minute. Observations made at 24, 48, 72 hours, and 7 days.

Results: At 24 hours, 2/6 animals of the unwashed group had corneal opacity (1/6=10, 1/6=20); 6/6 redness (6/6=2), chemosis (2/6=1, 4/6=2); 3/6 discharge (2/6=1, 1/6=2). At 72 hours, 1/6 corneal opacity (1/6=20). All other irritation had cleared. At 7 days, 1/6 corneal opacity (1/6=10). No irritation, corneal opacity present in washed group.

Study Classification: Core Guideline Data.

Toxicity Category: III - CAUTION.

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PAGES 3 THROUGH 8 ARE NOT INCLUDED. THOSE PAGES CONSISTED OF
DRAFT LABELING.