10-110
TXR-731

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

A.

000731

DATE: April 7, 1980

SUBJECT: EPA Registration No. 538-11
Halts Crabgrass Preventer
Caswell #357

FROM: Sherell A. Sterling
FHB/TSS

4/10/80
E 4/15/80

TO: Robert Taylor
Product Manager (25)

Applicant: O.M. Scott and Sons Company
Attn: Gerald L. Born
Marysville, OH 43040

Active Ingredient:
S-O,O-Diisopropyl phosphorodithioate ester of N-(2-Mercaptoethyl benzene sulfonamide 11%
Inert Ingredients.....89%

Background:

This Eye irritation study was submitted in order to change the signal word from CAUTION to WARNING. Previous labeling had been accepted on August 7, 1979 with the signal word CAUTION. An accession number has not yet been assigned to these data. The study was conducted by Raltech Scientific Services, Inc. of Madison, Wisconsin. A method of support was not indicated.

Recommendations

1. The data are considered unacceptable and inadequate support for the conditional registration of this product since the test substance was only identified as F-3586. A statement of the composition of the test material must be submitted.

2. FHB/TSS recommends that a statement of composition for the test substance be submitted. If the test substance is identical to the formulated product, the signal word must be changed to WARNING. However, if the test material differs from the formulated product, data ~~[illegible]~~ be submitted for another precautionary labeling review.

on the formulated product

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EPA FORM 1320-6 REV 3-76)

Labeling Recommendations:

1. The statement:

> Do not contaminate water by cleaning of equipment or disposal of wastes.

must appear under the "Environmental Hazards" section of the labeling.

2. Under "How to Use", the first statement must be revised to read:

> It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Review:

1. Primary Eye Irritation; Raltech P.O. # 9142022; June 20, 1979.

Procedure:

100 mg of test material was applied into one eye of each of nine New Zealand white rabbits. Three rabbits had the treated eye flushed with lukewarm water for one minute, 30 seconds post-installation; other six eyes remained unwashed. Test substance was only identified as "Inert Carrier/Pesticide: F-3586, 9-38-1HL." Draize scoring at 24, 48, 72, 96 hours and seven days.

Results:

At 24 hours, the unwashed eyes exhibited 3/6 with corneal involvement (2/6= 7.5, 1/6= 11.25); 2/6 showed iris injected; 6/6 with redness (3/6= 1.5, 3/6= 2); 6/6 with chemosis (2/6= 0.5, 4/6= 1) and 2/6 showed clear discharge (1/6= 0.5, 1/6= 1.0). Washed eyes at 24 hours only showed 3/6 with conjunctival redness (1/3= 0.5, 2/3= 1.0); no other irritation noted. All scores were negative by 72 hours.

Study Classification:

Core Guideline Data.

In order for this study to be useful, composition of test substance must be identified.

Toxicity Category:

II - WARNING.

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PAGES 3 THROUGH 6 ARE NOT INCLUDED. THOSE PAGES CONSISTED OF DRAFT LABELING.