



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

December 22, 2000

MEMORANDUM:

Subject: EPA Reg. No.: 2749-520/CIPC 98A
Case No.: 0271

From: Marianne Lewis, Biologist
Product Reregistration Branch
Special Review and Reregistration Division (7508C)

Marianne Lewis 12/22/00
MS

To: Venus Eagle-Kunst, CRM
Product Reregistration Branch
Special Review and Reregistration Division (7508C)

Applicant: Aceto Agricultural Chemicals Corporation
One Hollow Lane
Lake Success, NY 11042-1215

FORMULATION FROM EPA Reg. No. 2749-520 LABEL:

	<u>% by wt.</u>
<u>Active Ingredient(s):</u>	
Isopropyl N-(3-chlorophenyl) carbamate	98.0%
<u>Inert Ingredient(s):</u>	<u>2.0%</u>
Total	100.0%

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BACKGROUND: In the 8 month response to the Chlorpropham RED, the registrant cited five (81-1, 81-2, 81-4, 81-5, 81-6) studies to support the reregistration of their product, EPA Reg. No. 2749 520. The MRID #'s were as follows: 417636-01 (81-1), 417632-01 (81-2), 417633-01 (81-4), 417635-01 (81-5). The studies were conducted by T.P.S., Inc. The material used in the studies was Chlorpropham Technical Grade, a white crystalline solid. These studies were reviewed and accepted by TBI/HED on 6/20/91. Four (81-1, 81-2, 81-4, 81-5) of the studies were acceptable to support the reregistration of EPA Reg. No. 2749-520. The skin sensitization study (81-6) submitted does not meet the current standards set by the Agency and was reclassified as unacceptable. However, based on information available, the subject product was classified as a non-sensitizer and a new study was not needed.

The acute inhalation (81-3) study was initially waived by the Agency (memos dated 11/9/88 & 11/26/90) without assigning a Toxicity Category to the requirement. The registrant was contacted about how the product was actually used. The registrant stated that the 10 lb solid block was placed in the equipment and heated to vapor phase. When questioned about the temperature achieved by the equipment to change the chemical to vapor phase the registrant stated that he remembered 1100 °F. Decomposition of chlorpropham is at 247°F (502.2°C) . When this chemical is heated to decomposition it emits highly toxic fumes of Cl⁻, No_x, and phosgene. These gases would be present in the equipment and in the ventilation system of the potato storage building.

This was the basis for classifying this product as Toxicity Category I for the acute inhalation requirement. However, since the RED has explicit instructions to place respirator requirements on the label and entry restrictions, the Agency has reconsidered the classification of this product and is now downgrading the Toxicity Category assigned to Toxicity Category III.

RECOMMENDATIONS:

- The acute inhalation study for EPA Reg. No. 2749-520 has been waived and is downgraded to Toxicity Category III for this requirement.

The acute toxicity profile for EPA Reg. No. 2749-520 is currently:

Acute Oral	III	Acceptable
Acute Dermal	III	Acceptable
Acute Inhalation	III	Waived
Primary Eye	III	Acceptable
Primary Dermal	IV	Acceptable
Skin Sensitization	non sensitizer	Unacceptable

NOTE: The acute toxicity requirements have been satisfied for the subject product.

LABELING:

ID #: 002749-00520 CIPC 98A

SIGNAL WORD: CAUTION

HAZARDS TO HUMANS AND DOMESTIC ANIMALS:

Harmful if swallowed or absorbed through skin or inhaled. Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. Avoid breathing vapor.* Wear long-sleeved shirt and long pants, socks and shoes, and chemical resistant gloves (such as nitrile, butyl, neoprene, and/or barrier laminate). Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove contaminated clothing and wash clothing before reuse.

*This statement has been triggered by the Toxicity Category III assigned to the acute inhalation requirement. However, the requirements in the RED for the use of respirators for this product supersedes this labeling generated by the toxicity review.

FIRST AID:

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-xxx-xxxx for emergency medical treatment information.

Note to CRM/PM/Registrant:

Here are some suggested types of information that could be included, if applicable, in the Note to Physicians:

- technical information on symptomatology;
- use of supportive treatments to maintain life functions;
- medicine that will counteract the specific physiological effects of the pesticide;
- company telephone number to specific medical personnel who can provide specialized medical advice.

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