



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

PM-22 12/28/93  
*Cynthia Giles-Parker*  
Room 229

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

**MEMORANDUM**

**Subject:** EPA Reg. # 55146-AU; Champ Plus Flowable Copper Hydroxide

**TO:** Cynthia Giles-Parker PM # 22. Attn.: James Stone  
Herbicide-Fungicide Branch  
Registration Division (7505C)

**FROM:** David L. Ritter, Toxicologist *DLR 12-1-93*  
Precautionary Review Section  
Registration Support Branch  
Registration Division (7505W)

**THRU::** Thomas C. Ellwanger, Jr., Section Head  
Precautionary Review Section  
Registration Support Branch  
Registration Division (7505W)

*Mary Walker  
for T.E.  
12/28/93*

**Registrant:** Agtrol Chemical Products  
7322 Southwest Freeway Suite 4000  
Houston TX 77074

FORMULATION FROM LABEL:

|                                   |                 |
|-----------------------------------|-----------------|
| <u>Active Ingredient(s):</u>      | <u>% by Wt.</u> |
| Copper Hydroxide .....            | 37.5%           |
| <u>Inert Ingredient(s):</u> ..... | <u>62.5%</u>    |
| Total .....                       | 100.0%          |

Action Requested:

Expedite review of information from a dermal contact hypersensitivity study previously submitted (MRID # 428718-06) in support of this registration action. The study lacked positive control data. See my memorandum of 10/28/93.

The present submission includes the requisite information.

PRS Response:

The study references positive historical controls, but no detailed analytical data were submitted. The present submission likewise contains no such data. However, we reviewed our records of other sensitization studies performed at this laboratory (Stillmeadow, Inc.) and found that adequate positive control data are on file



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there. These data demonstrate that the assay as performed will detect dermal sensitizing agents.

PRS Recommendation:

The study is upgraded to CORE Guideline. The product is not a dermal sensitizing agent.

PRS data requirements for precautionary labeling are satisfied.

Precautionary Label Review:

Precautionary Statement:

Acceptable, except add a final sentence, "Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse."

Statement of Practical Treatment:

Acceptable.

*Not needed.  
Labels as  
WPS language  
for this*

**ACUTE TOX ONE-LINER**

1. PC CODE: 023401; Copper Hydroxide
2. CURRENT DATE: 12-1-93
3. TEST MATERIAL: Champ Plus Flowable Copper Hydroxide
4. EPA Reg. #: 55146-AU

| Study/Species/Lab/<br>Study#/Date                          | MRID No.  | Results                             | Tox.<br>Cat. | Core<br>Grade |
|--|-----------|-------------------------------------|--------------|---------------|
| Dermal Sens./Guinea<br>Pig/Stillmeadow/<br>0128-93/6-30-93 | 428718-06 | Upgraded study. Non-<br>sensitizing | ---          | G             |

Core Grade Key:

- G = Guideline
- M = Minimum
- S = Supplementary

DL02 12-1-93