



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

005773

SEP 10 1985

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCESMEMORANDUM

SUBJECT: Response Concerning Cholinesterase
Activity of Diallate

FROM: Thomas Edwards, Pharmacologist *Thomas Edwards 9-10*
Hazard Evaluation Division (TS-769)

TO: Robert Taylor, Product Manager (25)
Registration Division (TS-767)

THRU: Clint Skinner, Section Chief *Clint Skinner*
Review Section III *9-9-85*

and

Theodore Farber, Chief *9/10/85*
Toxicology Branch
Hazard Evaluation Division (TS-769)

Chemical: Diallate

Caswell No.: 299

EPA Registration No.: Registration Standard

Requested Actions: Response to company question in the attached
letter.

It is agreed that the study designated as MRID 00050737 was classified as valid and that no cholinesterase activity was found. Nevertheless the study is inadequate for regulatory use by EPA. This is true because the blood samples were drawn three (3) hours after dosing, which allowed time for reversal of carbamate inhibition of cholinesterase.

An acceptable cholinesterase study is needed.

In addition, neurological effects seen in other studies suggest the need for additional neurotoxicity information.

It is not acceptable to remove the cholinesterase inhibitory warning from the label requirements unless an adequate cholinesterase test is received and found to be negative.

reclassifying study as unacceptable
Thomas Edwards