



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

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MEMORANDUM

DATE: March 2, 1981

SUBJECT: Acme Vegetation Killer
KPA Reg. No. 33955-454

FROM: Sherell A. Sterling
FEB/TSS

Handwritten: 5-12-SI
E 3/12/81

TO: Richard Mountfort
Product Manager (23)

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Applicant: Acme Division
FBI/Gordon Corporation
300 South Third Street
P.O. Box 2276
Lawrence, Kansas 66110

Active Ingredients	
Prometon	1.6%
2,4-Dichloroacetic acid	7.0%
Aromatic petroleum distillates	76.4%
Inert Ingredients	19.0%

Background: A Dermal Sensitization test was submitted in response to a request made when other acute data were reviewed (see Sterling 3/28 /80). The other acute exposure data were considered adequate for conditional registration purposes.

The Dermal Sensitization study was conducted by Stillmeadow, Inc. of Houston, Texas. It is under Accession Number 244288.

Recommendations:

1. The Dermal Sensitization study is considered adequate and acceptable for conditional registration purposes.

Labeling Recommendations:

1. The statement "May cause allergic skin reaction" must be added to the "Hazards to Humans and Domestic Animals" section.

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2. Under "Directions for Use" please note the following:

- (a) The statement "It is a violation of federal law to use this product in a manner inconsistent with its labeling" must appear on the label. The appropriate place is directly below the "Directions for Use" heading.
- (b) The statement "Read Cautions First" is inappropriate and must be deleted. An alternative statement would be "Read Precautionary Statements first."

Review:

1. Guinea Pig Sensitization: Stillmeadow Project #1942-80; January 6, 1981; Acc. No. 244288

Procedure: Twenty male Hartley-albino guinea pigs were treated with 0.5 ml of a substance under occlusive wrap at days 0,3,5,7,10,12,14,17,19 and 21. In 10 of the animals, the test substance was 10% v/v solution of Acme Vegetation Killer in dionized water which was the highest non-irritating level. The remaining animals acted as a positive control with 0.05% w/v solution of 2,4-dinitrochlorobenzene in ethanol. On day 35, the animals were challenged with 0.5 ml of their respective test substances at each of two sites.

Results: At 48 hours, the positive controls showed no erythema or edema. The test substance showed erythema at 4/10 = 1 and edema at 1/10 = 1. At Day 35, the positive controls showed erythema in 17/20 = 1, 3/20 = 2 and edema in 10/20 = 1; the test substance showed erythema in 18/20 = 1, 1/20 = 2 and 10/20 = 1 for edema. The test substance was found to be a dermal sensitizing agent.

Study Classification: Core Minimum Data. The dosage levels should be: 0.05 ml initially, 0.1 ml 3 times per week for three weeks (total = 10), wait 2 weeks and challenge. Sites should be rotated.

Toxicity Category: Dermal sensitizer

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RIN-0334-94 PROMETON REVIEWS (088804)

Page 3 is not included in this copy.

Pages _____ through _____ are not included.

The material not included contains the following type of information:

- Identity of product inert ingredients.
 - Identity of product impurities.
 - Description of the product manufacturing process.
 - Description of quality control procedures.
 - Identity of the source of product ingredients.
 - Sales or other commercial/financial information.
 - A draft product label.
 - The product confidential statement of formula.
 - Information about a pending registration action.
 - FIFRA registration data.
 - The document is a duplicate of page(s) _____.
 - The document is not responsive to the request.
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The information not included is generally considered confidential by product registrants. If you have any questions, please contact the individual who prepared the response to your request.
