



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

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

FEB 1 1989

MEMORANDUM

SUBJECT: EPA Reg. No./File Symbol 264-467
Alette Fungicide

FROM: Mary L. Waller *mw* 2/1/89 *E* 2/1/89
Precautionary Review Section
Registration Support Branch
Registration Division (TS-767C) *DB* 2/2/89

TO: Larry Schnaubelt Acting (PM 21)
Herbicide Fungicide Branch
Registration Division (TS-767C)

APPLICANT: Rhone Poulenc Ag. Co.
P.O. Box 12014
T.W. Alexander Drive
Research Triangle Park, NC 27709

FORMULATION FROM LABEL:

<u>Active Ingredient(s):</u>	<u>% by wt.</u>
<u>Aluminum tris (o-ethylphosphate)</u>	<u>80%</u>
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<u>Inert Ingredient(s):</u>	<u>20%</u>
Total	100.0%

BACKGROUND:

The registrant has submitted a primary eye irritation study. The study was conducted by Biodynamics, Inc. The MEID number is 406251-01.

RECOMMENDATION:

RSB/PRS finds the study acceptable. The signal word is "CAUTION."

If a dermal sensitization study has not been submitted as requested in the FMB/ISS review dated 10-20-87, the registrant must fulfill this data requirement.

NOTE TO PM:

This ^{SENSITIZATION} data probably has not been submitted. The label does not state that the product is a sensitizer which would mean that the registrant ^{could have} ~~has not~~ cited data on the technical, and PL has no record of any reviews for 359-706 after the 10-20-87 review, therefore, we haven't seen any data which could possibly have been the sensitization study.

LABELING:

- 1) Change signal word on front and side panel to "CAUTION."
- 2) Statements of Practical Treatment appear on first and second page of label. Statements can be deleted from first page.
- 3) Revise Precautionary Statements as follows:
"Harmful if absorbed through skin or inhaled.
Causes eye injury. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling."
- 4) Add the following ^{to the statement of Practical Treatment.} for exposure via inhalation:
"IF INHALED: Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. Get medical attention."
- 5) If the supplemental labeling for Avocados (bearing) remains as a separate page and is not incorporated into the final printed label, then the signal word, precautionary statements and statements of practical treatment should appear on the supplemental labeling.

DATA REVIEW FOR ACUTE EYE IRRITATION TESTING (§81-4)

Product Manager: (21)
 MRID No.: 406251-01
 Testing Laboratory: Biodynamics, Inc.
 Author(s): CAROL S. Auletta
 Species: New Zealand white rabbits
 Sex: 2 males and 4 females Weight: _____
 Source: Summit View Farms, Hazelton, PA
 Dosage: 0.1 ml
 Test Material: Aliette WP
 Quality Assurance (40 CFR §160.12): attached

Reviewer: M. Waller
 Report Date: 5-13-88
 Report No. 4778-88

Summary:

Tox. Category: III Classification: Core Guideline Data
 Procedure (Deviation From §81-4): NONE

Results:

	Observations (number "positive"/number tested)							
	Hour	Days						
	1	1	2	3	4	7	14	21
Cornea Opacity	0/6	0/6	0/6	0/6	/	0/6		
Iris	0/6	0/6	0/6	0/6	/	0/6		
Conjunctivae Redness	0/6	1/6	0/6	0/6	/	0/6		
Chemosis	0/6	1/6	0/6	0/6	/	0/6		
Discharge	5/6	2/6	2/6	0/6	/	0/6		
Necrosis		2/6	2/6	3/6	/	0/6		

Comments: _____