



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

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AUG 29 1984

OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: #352-EUP-RRI. Application for an Experimental Use Permit for DPX-H6573 to be used on peanuts (crop destruct). Responses to TB Questions.

Tox. Chem. No. 419K

TO: Henry Jacoby, PM #21  
Registration Division (TS-767C)

FROM: Marion P. Copley, D.V.M. *M.P. Copley*  
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THRU: Edwin R. Budd, Section Head  
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*Budd*  
*8/23/84*  
*W/S*  
*8/27/84*

E. I. du Pont de Nemours and Co. has submitted responses (in a letter dated 5/18/84) to Toxicology Branch (TB) questions raised during their review of toxicity data needed to satisfy the requirement for an Experimental Use Permit application (crop destruct). DPX-H6573 is a new triazol chemical to be used as a fungicide on peanuts.

1. The questions asked (review of 5/2/84, Reg. #352-EUP-RRI, by M. Copley) by TB have all been answered satisfactorily (see attached).
2. Classification of the Sensitization - Guinea pigs (Haskell Lab. Report No. HLO 418-83) has been upgraded from core-supplementary to core-minimum.
3. The signal word and precautionary statements listed on the label are supported by the test results.
4. All studies required by TB have been presented and toxicologically support the issuance of the EUP for DPX-H6573 (352-EUP-RRI) for use on peanuts (crop destruct only).

Questions raised by TB in review of the acute toxicity data for DPX-H6573 (review of 5/2/84, Reg. #352-EUP-RRI, by M. Copley):

"1. The registrant needs to answer the following questions which have been raised in the course of the review:

° For all studies

Completely identify the material tested including the percent of active ingredient and the percent of each inert ingredient.

° Acute Oral LD50 - rats

Haskell Lab. Report No. 412-83

1) Please identify by sex and dose those surviving animals which had pink and/or dark red thymus glands.

° Eye irritation - Rabbits

Haskell Lab. Report No. HLO 517-83

1) Why does the protocol indicate 1 male/1 female with rinsed eyes when there are 2 females and 1 male in the results with rinsed eyes.

° Primary skin irritation and sensitization test - Guinea pigs

Haskell Lab. Report No. 418-83, Hazelton Project No. 201-640

Questions: During the course of reviewing this study, certain assumptions were made by the Toxicology Branch reviewer. These need to be clarified and either confirmed as correct or corrected:

- 1) Where was the challenge dose applied (flank?).
- 2) How were the primary irritation and challenge doses applied (topically?).
- 3) Give a reference or rationale for the use of dimethyl phthalate as the control substance in the Primary Skin Irritation and Sensitization Study."