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

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MEMORANDUM

SUBJECT: Chlorpropham (CIPC): Sprout Nip 7A; EPA #239-2593. Company response to data request on technical product.
HED #9-1427.
Tox. Chem. #510A.
Record #244951

TO: Robert Taylor/Cynthia Giles (PM-25)
Fungicide, Rodenticide Branch??
Registration Division (H7505C)

FROM: Stanley B. Gross, PhD, DAPT, CIH
Toxicology Branch I
Health Evaluation Division (H7509C)

THRU: Marion P. Copley, DVM, Head
Section 2, Toxicology Branch I
Health Effects Division (H7509C)

RECOMMENDATIONS.

The registrant has provided the requested information/data on the vapor pressure, odor and melting point (discussed below) of technical Chlorpropham which supports the claim registrants claim. Assuming Product Chemistry has approved the methods used to provide this information, Toxicology Branch I recommends that the requirement for an acute inhalation using technical CIPC be waived.

REQUEST

In his letter of November 17, 1988, Richard H. Stanton of the Valent company (representing Chevron Chemical Company) requested the waiver of an acute inhalation toxicity test for technician Chlorpropham (CIPC). Stanton indicated the low probability of inhalation exposure (sticky solid), the impossibility of micronizing the technical product and the low inhalation toxicity of CIPC technical dissolved in a solvent (Sprout Nip 7A, 79% a.i.) as reasons for the waiver request. Toxicology Branch's response to this request (memorandum of 4/7/89 by S. Gross) asked for detailed information to support the waiver request provided in the present submission.

DISCUSSION.

In response to Toxicology Branch's memo (4/7/89), the Registrant has sent Toxicology Branch I their Product Chemistry report, "Chlorpropham Technical Product Chemistry. Series 63", EPA MRID NO. 410137-2" which contains the methodologies and results of a number of physical/chemical tests of concern including:

Guideline	Test	Result
a) 63-3	Odor	Aromatic
b) 63-5	Melting Point	38.1-40.6 degrees C.
c) 63-9	Vapor Pressure	7.2 x 10(e-5) torr

This indicates that CIPC has a low melting point which would cause the product to liquify during a grinding operation and also that it has a low vapor pressure. This information, if accepted by Product Chemistry, provides the information needed in Toxicology Branch memo of 4/7/89 by S. Gross
to support the requested waiver.