

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

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MEMOR ANDUM

OFFICE OF FESTICIDES AND TOXIC SUBSTANCES

EPTC labeling for acute inhalation.

EPA ID# 76.

TB Project 7-0207

TO:

R.B. Taylor/J/ Miller, PM 25,

Registration Division (TS-767c)

FROM:

Irving Mauer, Ph.D.

Toxicology Branch

Hazard Evaluation Division (TS-769c)

THRU:

Judith W. in . irth, Ph.D, Acting Head

Section VI, ricology Branch

Hazard Evaluation Division (TS-769c)

Registrant: PPG Industries, Inc.

Judich W. Housweth 1/8/87 Mefor coff 1/10/87

Action Requested: By letter of October 3, 1986, the registrant requests changing the label signal word from "WARNING" (Tox. Cat. II) to "CAUTION" (Tox. Cat. III), based on the LC9 value of 1.39 mg/l (4 hr) provided in an acute inhalation study classified by TB as CORE-GUIDELINES (TB Review, dated 5/30/86, TB Document # 005170). The registrant cites the recently proposed revisions/clarifications of the toxicity category criteria as printed in the FEDERAL REGISTER, volume 40, No. 188, for Wednesday, September 26, 1984 (p. 37979), and suggests that this proposed classification scheme is "...being used by Tox. Branch."

Toxicology Branch Recommendation: The proposed revisions for acute inhalation cited by the registrant (as well as the other acute hazard indicators governing labeling requirements; have not yet been made a Final Rule. However, the new inhalation testing guidelines (FINAL RULES, as found at 40 CFR Parts 796, 797 and 798) require updated procedures (e.g., 4-hour exposures, actual rather than nominal concentration levels, etc.) for acceptable performance of acute inhalation studies, and cite scientific rationale (notably Haber's Law) which support these proposals, and the registrant's request.

Providing this is currently a consistent policy and practice within the Agency, this reviewer sees no objections on either scientific grounds or guidelines requirements to classifying the accepted value (1.39 mg/1 - 4 hr) for this study as representing Tox. Cat. III.