

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE: March 10, 1980

SUBJECT: EPA Reg. #246-GGA; PP#OF2277; 1-Naphthalene acetic acid
CASWELL #589

FROM: William Dykstra
Toxicology Branch, HED (TS-769)

WDD 3/11/80 WSW

TO: Robert Taylor & Residue Chemistry Branch
Registration Division (TS-767) (TS-769)

Action Requested: Response to letter from Union Carbide.

Recommendations:

1. Toxicology Branch defers to RCB as to the requirement for adequate metabolism studies which demonstrate that 1-naphthalene acetic acid is primarily formed from the ethyl ester compound in plants and animals.
2. A six-month dog study with a NOEL is needed to establish the ADI for 1-naphthalene acetic acid.
3. A teratology study in a second species is needed to explore the teratogenic potential of the compound.

TOX/HED:th:Initial WWOODROW:3-10-80

WDD 3/13/80
WDD 3/17/80