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

Caswell 385

SEP 19 1985

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Trichlorfon - Dylox 80% SPA, EPA Registration No. 3125-66. Acute studies waiver.

FROM: Irving Mauer, Ph.D.
Toxicology Branch
Hazard Evaluation Division (TS-769)

TO: Gary Otakie/W. M. Miller, PM 16
Registration Division (TS-767)

THRU: Jane E. Harris, Ph.D., Head
Section VI, Toxicology Branch
Hazard Evaluation Division (TS-769)

Registrant: Mobay Chemical

Action Requested:

The registrant requests that the acute toxicology data (inhalation, and primary dermal/eye irritation studies) previously submitted on the technical (submitted January 31, 1985, Accession Number 256446) be used to satisfy the requirements for the subject product.

Background:

Toxicology Branch has reviewed the acute studies on the technical (98.7 percent purity) previously submitted by the registrant (memo: Mauer to Otakie, dated June 27, 1985), and rendered the following assessments:

1. Acute Inhalation (Mobay Report No. 45153): - Core-Minimum Data (Tox. Cat. II)

2. Primary Dermal/Eye Irritation (Mobay Report No. 80616): Both Core-Supplemental Data, since in neither study was the applied dosage stated. If this information were

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supplied, these studies could be upgraded to Minimum, and assigned Tox-Cat. IV for skin effects, and Tox. Cat. III for ocular effects.

Registrant Submission:

By letter dated February 18, 1985, the registrant discusses the rationale for extrapolating results from studies on the technical to the subject product. The main thrust of this discussion is that Dylox 80 percent SPA (containing 82.0 percent of the ai, "trichlorfon grade 1", and [redacted] should have no greater acute toxic potential than that of the technical.

Inert ingredient information.

TB Recommendations/Conclusions:

The Agency tends to agree with this rationale, and would recommend establishing the same toxicity categories for this product as were assigned the technical, i.e., for inhalation, Tox. Cat. II; for primary dermal irritation, IV; and for eye effects, III. It is also noted that the requirement to submit data on dermal sensitization for the technical should have been available in March 1985 (p. 2 of registrant's letter of February 18, 1985), but TB has not yet received this study for review.