



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

NOV 3 1981

MEMORANDUM

DATE:

OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

SUBJECT: PP1F2466; EPA #42697-1 - Proposal to exempt Fatty Acid Soap (FAD) on all racs. (701A)

FROM: D. Ritter, Toxicologist  
Review Section #1

TO: W. Miller, PM #16  
IRB/Registration Division (TS-767C)

THRU: William Burnam, Acting Chief  
Toxicology Branch/HED (TS-769C)

Introduction:

Safer Agro-Chem, Inc. Jamul, California, is proposing to exempt potassium salts of fatty acids as an Insecticidal Soap. Alkaline salts of fatty acids are exempt pursuant to 40 CFR 180.1001(c) without restriction as surfactants and wetting agents. These FASs are also used extensively in commercially available household soaps such as Ivory, Irish Spring, Lux, etc.

The materials have direct food additive status under 21 CFR 172.863.

RCB has concluded that residues in racs would consist of potassium oleate; that oleate is a naturally occurring item found in human food; and that residues in meat, eggs, poultry and milk resulting from the proposed use would not exceed naturally occurring oleate. They have recommended for the exemption (review of 4/13/81, M. Bradley).

Acute toxicity data were reviewed in the product Branch (B. Backus, 2/13/80 and 7/21/80). These include:

- ° Acute Rabbit Dermal LD<sub>50</sub> > 5 gm/kg. CORE Minimum; TOX - IV
- ° Primary Dermal Irritation, Rabbit = 2.1. CORE Guideline; TOX - III
- ° Eye Irritation, Rabbit: No corneal opacity. CORE Guideline; TOX - II.

RACS = RAW AGRICULTURAL COMMODITIES

Conclusion:

Toxicology Branch has no objection to exempting this Active Ingredient, identified as "potassium oleate and related C<sub>12</sub> - C<sub>18</sub> fatty acid potassium salts", in the RCB review noted above. We suggest that a separate entry under 180.10XX would be appropriate.

Our bases for this finding are those noted in the M. Bradley review.

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