



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

MEMORANDUM

DATE: November 6, 1980

SUBJECT: Dual 8E Herbicide
EPA Registration No. 100-597

FROM: Sherell A. Sterling *SA*
FHB/TSS

*11-12-80
E 11/12/80*

TO: Richard Mountfort
Product Manager (23)

Applicant: Ciba-Geigy Corporation
Agricultural Division
P.O. Box 11422
Greensboro, NC 27409

Active Ingredient:

Metolachlor.....86.4%

Inert Ingredients.....13.6%

Background:

A letter was submitted by Ciba-Geigy (9/25/80) in response to a previous review (see Sterling 8/25/80). The purpose of the original request was to provide acute toxicology testing on alternate formulations of Dual 8E. Four formulations were tested.

Recommendations:

1. The documentation of attempts to generate toxic aerosols of metolachlor and its formulations is important in our decision - making process. Since the low volatility precludes aerosolization to a sufficiently high concentration, additional inhalation testing is not necessary at this time.
2. The discussion of your eye irritation scoring scheme was helpful and necessary in evaluating the eye studies. FHB/TSS finds that the following studies should be re-classified as Core Guideline Data with a toxicity category of II:

(A) Eye Irritation Study on Dual 8E Formulation FL - 790393; Stillmeadow
#1253-79; August 7, 1979; Acc. No. 242553

(B) Eye Irritation Study on Dual 8E Formulation FL -790401; Stillmeadow
#1165-79; June 4, 1979, Acc. NO. 242554

(C) Eye Irritation Study on Dual 8E Formulation FL-790388; Stillmeadow
#1252-79; August 3, 1979, Acc. No. 242552

3. Due to the skin sensitization problems encountered with the product, FHB/TSS can agree to the skin irritation statements associated with Toxicity Category II. Thus, there will be no differences in precautionary labeling. All four formulations may be considered acceptable under EPA Registration No. 100-597.
4. Since all of the questions raised by our previous review (Sterling, 8/25/80) have been answered, FHB/TSS has no objection to the acute toxicology studies submitted for each of the alternate formulations.
5. Please note that Dermal Sensitization study may be required in the future.
6. Additional discussion of the test results as provided in Norton's letter of September 25, 1980 was extremely helpful. The registrant should feel free to include such a discussion whenever it would be helpful to the Agency in the decision - making process.

7. The appropriate signal word is WARNING.
Precautionary Statements are satisfactory as they appear on the latest accepted labeling (7 Apr 1980).

sdh
11-12-80