



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

28/JUL/2004

MEMORANDUM

Subject: Name of Pesticide Product: GF-947 Granule SF
EPA Reg. No./File Symbol: EPA File Symbol 62719-LNG
DP Barcode: 305225
Decision #: 211695
PC Code: 119031 Benzenesulfonamide, 2-(2,2-difluoroethoxy) -
N-(5,8-dimethoxy[1,2,4]triazolo[1,5c]pyrimidin-2-yl)
-6(trifluoromethyl) (DE-638, Penoxsulam)

From: Tracy Keigwin *TK*
Technical Review Branch *JIN*
Registration Division (7505C)

To: Philip Errico, PM 23
Herbicide Branch
Registration Division (7505C)

Applicant: Dow AgroSciences LLC.
9330 Zionsville Road
Indianapolis, IN 46268

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FORMULATION FROM LABEL:

<u>Active Ingredient(s):</u>	<u>% by wt.</u>
119031 Penoxsulam	0.24
<u>Inert Ingredient(s):</u>	<u>99.76</u>
Total:	100.00%

ACTION REQUESTED: PM requests review of response from Dow Agrosiences LLC with regard to EPA File Symbol 62719-LNG.

BACKGROUND: Dow AgroSciences LLC has submitted a response to our review concerning EPA File Symbol 62719-LNG. The acute inhalation toxicity study used to support the registration of EPA File Symbol 62719-UOO was found unacceptable due to unusual study results. Since EPA File Symbol 62719-LNG relied on the acute data that was submitted to support EPA File Symbol 62719-UOO it was also found unacceptable for registration. The response from Dow rebutted the previous review and provided an explanation for the erroneous result in the acute inhalation study from EPA File Symbol 62719-UOO.

RECOMMENDATIONS: The rebuttal from Dow was thorough and acceptable for EPA File Symbol 62719-UOO (and thus EPA File Symbol 62719-LNG). We will accept the explanation for the differences in nominal and gravimetric concentrations for the acute inhalation study submitted in support of EPA File Symbol 62719-UOO (MRID 45830818) and will agree to a toxicity 4 classification for acute inhalation toxicity for MRID 45830818.

The acute toxicity profile for EPA File Symbol 62719-LNG is as follows:

Acute oral toxicity	IV	Cited	MRID 45830812
Acute dermal toxicity	IV	Cited	MRID 45830815
Acute inhalation toxicity	IV	Cited	MRID 45830818
Primary eye irritation	IV	Cited	MRID 45830820
Primary skin irritation	IV	Cited	MRID 45830823
Dermal sensitization	No	Cited	MRID 45830826

PRECAUTIONARY STATEMENTS: EPA File Symbol 62719-LNG:

No precautionary labelling is required since this product is category IV for all routes of exposure and is not a dermal sensitizer. The precautionary labelling and first aid statements on the provided label are acceptable.

The minimum ppe for this product is as follows:

Applicators and other handlers must wear:

Long sleeve shirt

Long pants

socks

shoes

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