

APR 3 1987

MEMORANDUM

SUBJECT: Conditional Registration of Sulfosate

TO: Robert Taylor
Herbicide and Fungicide Branch
Registration Division (TS-767C)

FROM: Curt Lunchick, Acting Chief
Section 2
Exposure Assessment Branch
Hazard Evaluation Division (TS-769C)

EAB has evaluated the proposed registration of sulfosate (Touchdown Concentrate, Reg. No. 476-EEEL) and strongly re-comments against granting conditional registration until major concerns are addressed.

There appears to be an inconsistency between the label and the toxicity data. The Toxicology Branch one-liners list two inhalation toxicity studies (Acute inhalation LC 50 - rat, Environmental Health Cen., #T-11870, SC-0224, 41.2% and Acute inhalation LC50-rat, Environmental Health Center, #T-11728, SC-0224, 56.2%) that are guideline and list the end use products as Toxicity Category I for inhalation. There is also a primary eye irritation study (Stauffer Richmond Tox. Lab, SC-0224-41C, 41.4%) that is core minimum and Toxicity Category I apparently due to [REDACTED]. Despite this toxicity data the proposed label carries the signal word-Caution for the 52.2% a.i. product. The label must bear the signal word Danger if the acute toxicity data is valid. If the toxicity data is not valid the invalidity must be explained. The latest 40.8% product does contain the Danger signal word but only for the primary eye irritation.

The label is very poorly written in regards to safety precautions based on our interpretation of the toxicity data and Stauffer must submit a revised label to EAB for evaluation. Our concerns involve the following issues:

- 1) No prohibition against use by homeowners since it can be used for lawn renovation.

INERT INGREDIENT INFORMATION IS NOT INCLUDED

- 2) The statement of practical Treatment is confusing. I am not sure what "If a known exposure occurs or is suspected, immediately initiate the recommended procedures, below" means. Exposure to a pesticide always occurs during use. The term exposure must be changed. The statement "If inhaled, remove to fresh air." seems to imply indoor use. Where is fresh air versus contaminated air located in an outdoor setting?
- 3) No protective clothing is provided to address the Toxicity Category I inhalation problems. The labels must require goggles and a respirator approved by NIOSH for pesticides. Because of the respirator the label should not recommend a face shield.

Since EXAMS modeling will be conducted by Ecological Effects Branch in the future, Exposure Assessment Branch recommends that and Adsorption/Desorption Study (163-1), with K_0 values calculated for the ionic species, be required as a condition to registration.

cc: Therese Dougherty
Robert Holst
Anne Barton