



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

006648

OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

FEB 10 1988

MEMORANDUM

SUBJECT: EPA File Symbol 707-ERN  
RH-3866 Technical

FROM: Deloris F. Graham *D.F.G. 2/17/88*  
Technical Support Section  
Fungicide-Herbicide Branch  
Registration Division (TS-767C) *E 2/17/88*

TO: Lois A. Rossi, PM 21  
Fungicide-Herbicide Branch  
Registration Division (TS-767C)

APPLICANT: Rohm and Haas Company  
Independence Mall West  
Philadelphia, PA 19105

ACTIVE INGREDIENTS:  
Aralkyl triazole . . . . . 92.0%  
INERT INGREDIENTS: . . . . . 8.0%

BACKGROUND:

Submitted Acute Inhalation and Dermal Sensitization Studies to fulfill acute toxicity data requirements for conditional registration. Studies conducted by Rohm and Haas Company Toxicology Department. Data under EPA MRID Nos. 403571-01 and -02. Method of support not indicated.

RECOMMENDATION:

FHB/TSS finds these data acceptable to support conditional registration of this product.

LABEL:

Precautionary Statements must be revised to include the following statement "This product may cause allergic skin reaction."

006648

*1 of 3*

REVIEW:

- (1) Acute Inhalation Toxicity Study: Rohm and Haas Company;  
Report No. 87R-028; August 31, 1987; EPA MRID No.  
403571-01.

PROCEDURE:

Ten male and ten female rats were exposed nose-only for four hours to a analytical concentration of  $5.1 \pm 1.6$  mg/L (nominal concentration = 19.9 mg/L). Mass median diameter reported to be 2.5  $\mu$ m with 1.8 geometric standard deviation. Chamber temperature and relative humidity reported to be  $24.9 \pm 1.5$  °C and  $64.4 \pm 3.8\%$  respectively. Observations made for 14 days postexposure. Necropsy performed on all animals.

RESULTS:

No mortalities reported. Toxic signs reported included rales, dyspnea, bradypnea, gasping, reddened paws, red exudate around the eyes, wet abdominal fur, gasping, red stains on the drop sheets, decreased fecal output, decreased food consumption, unthrifty appearance. Necropsy report revealed red foci on lungs, red spotted cervical lymph nodes. LC<sub>50</sub> reported to be greater than 5.1 mg/L.

STUDY CLASSIFICATION: Core Guideline Data

TOXICITY CATEGORY: IV - CAUTION

- (2) Dermal Sensitization Study: Rohm and Haas Company;  
Report No. 87R-035; June 25, 1987; EPA MRID No. 403571-02.

PROCEDURE:

Using the Buehler method, twelve guinea pigs ten induction doses (3 dose/week) of 0.4 ml of 50% w/w RH-3866 technical in 80% v/v aqueous ethanol. Another group of twelve guinea pigs were treated in similar manner as previous group except 1-chloro-2,4-dinitrobenzene (DNCB) at 1600 ppm in 80% v/v aqueous ethanol, positive control, was used. A group of twelve guinea pigs received no treatment during induction and served as naive control group. Two weeks after final (10th) induction phase a challenge dose was applied. One week after challenge a rechallenge dose was applied. Observations made at 24 and 48 hours after each application. A 50% w/w test material in acetone was used at challenge and rechallenge.

006648

RESULTS:

Minimal erythema in animals induced with test material; 3/12 animals had minimal erythema at 24 hours postchallenge and 1/2 at 48 hours postchallenge; 1/12 had minimal erythema at 24 hours after rechallenge thereby indicating that a weak sensitization reaction occurred. No irritation produced in naive control at challenge or rechallenge. Positive control (DNCB) produced significantly more irritation at challenge and rechallenge than at induction, which indicates a sensitization reaction.

STUDY CLASSIFICATION: Core Guideline Data

TOXICITY CATEGORY: Sensitizing agent.

006648

3