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

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AUG 18 1986

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: 10182-EUP-UR. Karate™. Application for Experimental Use Permit. No. 10182-EUP-UR.

Tox. Chem. No. 725C

TO: George LaRocca (PM Team #15)
Registration Division (TS-767c)

FROM: Pamela M. Hurley, Toxicologist
Section II, Toxicology Branch
Hazard Evaluation Division (TS-769c)

THRU: Edwin R. Budd, Section Head
Section II, Toxicology Branch
Hazard Evaluation Division (TS-769c)

Record No. 160568

ICI Americas requested an Experimental Use Permit for Karate 1EC for evaluation against destructive insects on a number of crops. In a memorandum to George LaRocca dated May 8, 1986, the Toxicology Branch had no objection to the issuance of the permit provided certain changes be made on the label for the formulation. One of the changes involved placing the word "DANGER" on the front panel and placing the word "POISON" with a skull and crossbones next to it on the label as well. These changes reflected a classification of the acute inhalation study on the 13% formulation as Toxicity Category I. The classification of the inhalation study was based on the old Toxicity Category chart which placed chemicals in Toxicity Category I when the LC_{50} was 0.2 mg/l or less for a 1-hour inhalation study. The new chart reflects the values for a 4-hour inhalation study, which is what is recommended in the EPA Guidelines. Therefore, the new value for classifying an acute inhalation study as Category I is an LC_{50} value of 0.05 mg/l or less. Thus, the Toxicity Category for the acute inhalation study on the 13% formulation of Karate is to be changed from Category I to II since the LC_{50}'s for the formulation in male and female rats fall between 0.05 and 0.5 mg/l (i.e. 0.315 and 0.175 mg/l respectively). The Toxicology Branch has no objection to removing the word "POISON" and the skull and crossbones from the label. However, the word "DANGER" should remain on the label because the dermal irritation study indicates that the substance is corrosive to the skin and is thus Toxicity Category I.

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