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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

06-MAR-2007

MEMORANDUM

SUBJECT: **MGK-264.** Health Effects Division (HED) Response to Comments on the MGK-264 Reregistration Eligibility Decision (RED). PC Code 057001; DP Barcode D334552.

From: William H. Donovan, Ph.D., Chemist
John Doherty, Ph.D., Toxicologist
Reregistration Branch 3
Health Effects Division [7509P]

William H. Donovan
John Doherty 3/6/07

Through: Catherine Eiden, Branch Chief
Reregistration Branch 3
Health Effects Division [7509P]

C. Eiden

To: Cathryn O'Connell, Chemical Review Manager
Reregistration Branch 2
Special Review and Reregistration Division [7508P]

McLaughlin Gormley King (MGK) Company has provided comments on the MGK-264 RED in a letter dated 24-OCT-2006. In general, MGK now agrees with the RED but specifies several remaining issues where they still have concerns about the conservative nature of the assessment. Most of these issues were discussed in a previous response to comments memo (D324672, W. Donovan, J. Doherty, and S. Weiss; 11-MAY-2006). For the majority of these issues, there were no new data provided that might result in modified interpretations of the available information. Thus, these issues will not be repeated in this memo.

However, as mentioned in the 24-OCT-2006 MGK letter, the results of a 21-day dermal study in rats were submitted and inclusion of these findings impacts the MGK-264 risk assessment. A detailed review of the 21-day dermal study in rats is presented in a separate memo (TXR # 0054520, J. Doherty, 06-MAR-2007). The submitted study reveals no systemic toxic effects in rats at the limit dose of 1000 mg/kg/day. Considering

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this result together with the overall toxicological profile of MGK-264, HED has determined that no dermal risk assessment is appropriate for MGK-264. Accordingly, we now concur with MGK Company's position that the previously identified risks of concern due to dermal exposures arising from occupational and residential uses are no longer relevant. The MGK-264 RED document will be modified to reflect these changes under the registration review process.



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Chemical: 4,7-Methano-1H-isoindole-1,3(2H)-dione, 2-(2-ethylhexyl)-3a,4,7,7a-tetrahydro-

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