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OPP OFFICIAL RECORD
HEALTH EFFECTS DIVISION
SCIENTIFIC DATA REVIEWS
EPA SERIES 361

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: ID:055947-EUP-RA - Sodium Salt of SAN 835H; Tech and Salt (formulation contains Dicamba),

Tox. Chem. No.: none
PC No.: 005107
029817 (Dicamba)
DP No.: D232811
Submission No.: S516012

FROM: Marion Copley, D.V.M., D.A.B.T.
Registration Action Branch 1
Health Evaluation Division (7509C)

Marion Copley 7/15/97

TO: Susan Stanton/Joanne Miller, PM 25
Registration Division (7505C)

THRU: Melba Morrow, D.V.M., Branch Senior Scientist
Registration Action Branch 1
Health Evaluation Division (7509C)

Edward Jeyaraj

I. CONCLUSIONS:

This action for an EUP with crop destruct for use of the Sodium Salt of SAN 835H on corn is being logged out of HED and returned to RD as per conversation with S. Stanton and J. Miller (7/10/97). The studies that were received with this action are remaining in HED for review and will be held until the full Section 3 request is submitted to HED for full review. RD should include a copy of this memo and also note in their new request that some data and DERs are in HED with Marion Copley (contract Work Assignment Manager).

II. ACTION REQUESTED

Registration Division submitted an EUP (055947-EUP-RA) with crop destruct for use on corn. Toxicity studies were received in HED to support the toxicology portion of a request for an EUP for corn. No temporary tolerances were requested since this was a crop destruct request.

Technical (SAN 835H)

Guideline	MRID
81-1	44170139
81-2	44170140
81-3	44170141
81-4	44170142
81-5	44170143
81-6	44170144
81-8	44170145
83-3a	44170116
83-3b	44170147
83-4	44170148
84-2	44200401
84-2	44170149
84-2	44170150
84-2	44170151
84-2	44170152

FORMULATION Sodium Salt of SAN (formulation contains sodium salt of DICAMBA) (SAN 1269 H70 WG 403 DP)

81-1	44194102
81-2	44170109
81-3	44170110
81-4	44170111
81-5	44170112
81-6	44170113
82-2	44170114

III. COMMENTS

A. Although this action was not given any priority HED sent the studies to the contractor for review.

B. When the full section 3 request is submitted to HED for review, RD should include a copy of this memo and also note in their new request that some data and DERs are in HED with Marion Copley (contract Work Assignment Manager).

C. Preliminary review of the studies by the contractor, identified the following problems/issues which have been communicated to the Registration Division PM, Joanne Miller (conversation 7/10/97).

- 1) Two dermal acute studies (81-2) (MRID 44170140, SNC 189a and MRID 44170113, SNC 189c)

The reports stated that the test substance was applied to a 50 x 50 mm area of each rabbit. The application area is less than the required application area of 10 % of the total body surface area (Subdivision F guidelines). This needs to be clarified, justified or corrected for each study.

- 2). Two dermal sensitization studies (81-6) (MRID 44170144, SNC 192a, MRID 44170113, SNC 192b)

The experimental dates for the positive control study were not provided.

- 3). Acute neurotoxicity study in the rat (81-8) (MRID 44170145, SNC 186)

No positive control data were submitted with this study.