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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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DATE: July 22, 1981

SUBJECT: EPA Registration Number: 538-137
Proturf HE Fertilizer with Weedgrass Preventer

FROM: Deloris F. Graham 7/22/81
FHB/TSS

TO: Robert Taylor
Product Manager (25)

002031

Applicant: O.M. Scott and Sons
Marysville, Ohio 43041

Active Ingredient:

S-(O,O-Diisopropyl phosphorodithioate) ester
of N-(2-Mercaptoethyl) benzenesulfonamide 6.63%

Inert Ingredients: 93.37%

Background: Scott is resubmitting the Eye Study for this product to be evaluated using the new criteria for evaluating the Eye Study in effect March 1981. The current signal word is "WARNING," as determined by the Eye Study originally. Scott feels the reevaluation using the new criteria will indicate the signal word "CAUTION."

Recommendation:

(1) Based on the reevaluation of the Eye Study, submitted July 7, 1980. the appropriate signal word is "CAUTION."

Label:

(1) The signal word "CAUTION" must appear on center front panel.

(2) The statement "Do not contaminate feed or foodstuffs" must be deleted from "Precautionary Statements" and placed in "Directions For Use."

(3) Under the heading "Envronmental Hazards" the statement "Keep out of lakes, ponds, or streams" must be revised to read "Do not apply directly to lakes, ponds or streams."

Review:

(1) Eye Irritation Study; Raltech Scientific Services, Inc.; Lab #760871; December 20, 1979.

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EPA FORM 1320-6 (REV 3-76)

Procedure: 9 New Zealand white rabbits were treated with 0.1g of test material in one eye of each rabbit. The animals were divided into two groups, Group I consisting of 6 rabbits with treated, unwashed eyes and Group II consisting of 3 rabbits with treated, washed eyes. Body weights were recorded. Observations were made at 24, 48, 72 and 96 hours and at 7 days after treatment. All animals that died during the study were necropsied.

Results: In Group I at 24 hours, 6/6 animals had corneal opacity (2/6=5, 3/6=10, 1/6=22.5), iris irritation (6/6=5), conjunctive redness (4/6=2, 1/6=2.5, 1/6=3), conjunctive chemosis (3/6=1.5, 1/6=2.0, 1/6=2.5, 1/6=3.0), and conjunctive purulent discharge (1/6=1.0, 1/6=1.5, 4/6=2.0). Corneal opacity (1/6=7.5) persisted through day 4 and iris irritation (3/6=5) through day 3. Conjunctive redness (1/6=0.5, 3/6=1.0) and chemosis (1/6=1.5) persisted through day 7. By day 14 all irritation had cleared.

In Group II at 24 hours, 3/3 animals had corneal opacity (2/3=2.5, 1/3=20), iris irritation (3/3=5), conjunctive redness (1/3=1, 1/3=1.5, 1/3=2), conjunctive chemosis (2/3=1, 1/3=2) and conjunctive purulent discharge (2/3=1, 1/3=1.5). Corneal opacity (1/3=10) persisted through day 3, iris irritation (3/3=5) through day 2, and conjunctive redness (1/3=1) and chemosis (1/3=1) persisted through day 4. All irritation had cleared by day 7. One animal was found dead on day 7.

Necropsy of the animal which died during the study revealed lungs and heart covered with tan purulent exudate. Left lung was dark red and soft. Right lung was tan, dark red and firm.

Study Classification: Core Guideline Data

Toxicity Category: III-CAUTION

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PAGES 3 THROUGH 7 ARE NOT INCLUDED. THOSE PAGES CONSISTED OF DRAFT LABELING.