

US EPA ARCHIVE DOCUMENT

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

003223

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

DATE: MAY 21 1981

SUBJECT: Clearance of Inert Ingredient Dowicil 75 [1-(3-chloroallyl)
3,5,7-triaza-azoniaadamantane chloride] as a preservative.
RCB review of 8/13/80, N. Dodd. [redacted] amendment of 3/30/80.
CASWELL [redacted] CASWELL #181 (inert)

FROM: David Ritter, Adjuvants Toxicologist
Review Section #1
Toxicology Branch/HED (TS-769)

TO: Robert Taylor PM #25
Registration Division (TS-767)

THRU: Christine F. Chaisson, Acting Chief
Toxicology Branch/HED (TS-769)

[redacted]

Of interest to Toxicology Branch is the conclusion that Dowicil 75 has not been exempted from the requirement of a tolerance pursuant to 40 CFR §180.1001.

Our Comment:

Toxicology Branch reviewed a proposal by Dow in 1978 for clearance of Dowicil 75 under §180.1001(d), preharvest application only, and with a 1.0% restriction in the formulation (Review of D. Ritter, 1/19/78).

Our conclusion was favorable for the proposal, based on ninety day dog and rat feeding studies whose reviews we examined at FDA. The NOELs noted were:

- 90 day rat feeding NOEL = 150 ppm - systemic - (CORE Guideline)
- 90 day dog feeding NOEL = 300 ppm - systemic - (CORE Guideline)

INFORMATION WHICH MAY REVEAL A PRODUCT USE OF AN INERT INGREDIENT IS NOT INCLUDED

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We are not aware of any reason why the proposal was never published; nevertheless we see no reason to alter our previously favorable opinion. This finding should be applicable in the present instance where the formula concentration is only 0.1%.

We have attached a copy of this review for your convenience.

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