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

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OFFICE OF
PESTICIDES AND TOXIC
SUBSTANCES

MEMORANDUM

SUBJECT: Possible 6(a)2 Data for Chlorpropham---Company Response
to Previous Tox. Review

Chemical: 510A (018301)
RD Record: S-406680
HED Project: 2-0438

FROM: Irving Mauer, Ph.D., Geneticist
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Irving Mauer
11/20/91

TO: Venus Eagle/Walter Waldrop, PM #71
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THRU: Karl P. Baetcke, Ph.D., Chief
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Karl P. Baetcke
11/24/91

Registrant: Chlorpropham Task Force, Liberty, MO.

Request: Appraise Company rebuttal (under cover of October 30, 1991) to Tox-I rejection of the following mutagenicity study:

Mutagenicity Test on Chlorpropham in an In Vitro Cytogenetic Assay Measuring Chromosomal Aberration Frequencies in Chinese Hamster Ovary (CHO) Cells, (HLA) Study
No. 12276-0-437, Final Report dated April 3, 1991
(MRID No. 41846701).

TB-I Conclusions: In our original review (DER attached to memo: Mauer to Rossi/Farmer; HED Doc. No. 008552, dated September 6, 1991), we judged the study presumptively positive under metabolic activation conditions for clastogenicity (i.e., inducing structural chromosome aberrations), but inadequately performed to support the reported negative results without such activation; hence, UNACCEPTABLE as a comprehensive in vitro assay for such genotoxic effects.

The additional information more recently provided the registrant by the performing laboratory (Hazleton Washington), together with citations from the current Agency Testing

Guidelines for this type of mutagenicity testing, satisfy the regulatory framework, in the sense as related in the rebuttal that: "... A test compound is evaluated as clastogenic based on response in either portion of the assay."

Therefore the data in the original report plus the subsequent response permit upgrading this study to ACCEPTABLE, as demonstrating positive results, i.e., mutagenic effects, (specifically, structural chromosome aberrations) in vitro (Chinese hamster ovary cell cultures), indicating potentially adverse toxicity as defined by FIFRA Sect. 6(a)(2).