March 23, 2000

MEMORANDUM:

Subject: EPA Reg. No.: 2749-102/Chloro IPC Technical Herbicide
DP Barcode: D263704
Case No.: 0271

From: Marianne Lewis, Biologist
Product Reregistration Branch
Special Review and Reregistration Division (7508C)

To: Venus Eagle-Kunst, CRM
Product Reregistration Branch
Special Review and Reregistration Division (7508C)

Applicant: Aceto Agricultural Chemicals Corporation
One Hollow Lane
Lake Success, NY 11042-1215

FORMULATION FROM EPA Reg. No. 2749-102 LABEL:

<table>
<thead>
<tr>
<th>Active Ingredient(s):</th>
<th>% by wt.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Isopropyl N-(3-chlorophenyl) carbamate</td>
<td>98.0%</td>
</tr>
<tr>
<td>Inert Ingredient(s):</td>
<td>2.0%</td>
</tr>
<tr>
<td>Total</td>
<td>100.0%</td>
</tr>
</tbody>
</table>
BACKGROUND: In the 8 month response to the Chlorpropham RED, the registrant is citing five (81-1, 81-2, 81-4, 81-5, 81-6) studies to support the reregistration of their product, EPA Reg. No. 2749-102. The MRID #’s are as follows: 417636-01 (81-1), 417632-01 (81-2), 417633-01 (81-4), 417635-01 (81-5), and 417634-01 (81-6). The studies were conducted by T.P.S., Inc. The material used in the studies was Chlorpropham Technical Grade, a white crystalline solid. These studies were reviewed and accepted by TBI/HED on 6/20/91. Four (81-1, 81-2, 81-4, 81-5) are of the studies are acceptable to support the reregistration of EPA Reg. No. 2749-102. The skin sensitization study (81-6) submitted does not meet the current standards set by the Agency and will be reclassified as unacceptable. However, based on information available, the subject product will be classified as a non-sensitizer and a new study is not needed. The acute inhalation (81-3) study was initially waived by the Agency (memos dated 11/9/88 & 11/26/90) without assigning a Toxicity Category to the requirement. Based on information available, PRB/SRRD will again waive the acute inhalation study (81-3) and assign the subject product a Toxicity Category III for this requirement.

RECOMMENDATIONS:

- Four (81-1, 81-2, 81-4, 81-5) of the cited studies are acceptable to support the reregistration of EPA Reg. No. 2749-102.
- The skin sensitization study (81-6) cited is unacceptable. However, based on information available the subject product will be classified as a non sensitizer. A new study is not needed.
- The acute inhalation study (81-3) waiver request is approved. The subject product will be classified as Toxicity Category III for this requirement.

The acute toxicity profile for EPA Reg. No. 2749-102 is currently:

<table>
<thead>
<tr>
<th>Toxicity Category</th>
<th>Acute Oral</th>
<th>Acute Dermal</th>
<th>Acute Inhalation</th>
<th>Primary Eye</th>
<th>Primary Dermal</th>
<th>Skin Sensitization</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>III</td>
<td>III</td>
<td>III</td>
<td>III</td>
<td>IV</td>
<td>non sensitizer</td>
</tr>
<tr>
<td></td>
<td>Acceptable</td>
<td>Acceptable</td>
<td>Waived</td>
<td>Acceptable</td>
<td>Acceptable</td>
<td>Unacceptable</td>
</tr>
</tbody>
</table>

The acute toxicity requirements have been satisfied for the subject product.
LABELING:

ID #: 002749-00102 CHLORO 1PC TECHNICAL

SIGNAL WORD: CAUTION

HAZARDS TO HUMANS AND DOMESTIC ANIMALS*:

Harmful if swallowed or absorbed through skin or inhaled. Causes moderate eye irritation. Avoid contact with eyes, skin, or clothing. Avoid breathing dust. Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove contaminated clothing and wash clothing before reuse.

FIRST AID:

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to by a poison control center or doctor.

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing. Call a poison control center or doctor for treatment advice.

IF ON SKIN: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment.

*The designation of Personal Protective Equipment (PPE) for manufacturing use products does not fall under the jurisdiction of EPA, therefore, PPE has not been specified for this product.
- medicine that will counteract the specific physiological effects of the pesticide;
- company telephone number to specific medical personnel who can provide specialized medical advice.