DATE: August 4, 1980

SUBJECT: EPA Registration No.: 539-72
Super Turf Builder Plus 2 for Grass: Caswell #315559

FROM: Deloris F. Graham 8/14/80
FHB/TSS

TO: Richard Moutsdoot
Product Manager (23)

Applicant: O.M. Scotts & Sons Company
Attention: Gerald L. Born
Marysville, OH 43040

Active Ingredients:
2,4-Dichlorophenoxacetic acid.......................... 0.55%
2-(2-methyl-4-chlorophenoxy)propionic acid.......... 0.55%
Inert Ingredients........................................ 98.90%

Background:
Submitted new eye toxicology data changing the precautionary
statements from CAUTION to WARNING, requesting an alternate inert
ingredient and minor label revisions.

Recommendations:

1. FHB/TSS agrees with the applicant that the correct signal
word for the product tested is WARNING, however, the study
does not state whether the test substance was the original
formulation or the alternate formulation as proposed. Please
submit clarification of this point.

2. In the pesticidal/fertilizer formulations, each formulation
proposed and any inert, other than the fertilizer grades
must be identical; i.e. surfactants, wetting agents, etc.
for registration under the same registration number.

3. It could not be determined if the change in signal word from
CAUTION to WARNING based on the change in eye irritancy is
directly related to the change in inert ingredients. If
this change in eye irritancy is due to the change in inert ingredients then this application for amended registration is not appropriate. Please see CFR 40-162.21(a)(1).

4. FNB/TSS objects to the proposed changes until test substance is identified and the appropriate method of submission is determined.

Label:

1. Reserve labeling comments until test substance is identified and the appropriate method of submission is determined.

Review:


Procedure:

9 New Zealand white rabbits received a 0.1g dose of the test material in one eye of each rabbit. After 30 seconds, the treated eyes of three rabbits were washed for 1 minute with lukewarm water. Observations were made at 24, 48, 72 and 96 hours and at 7 and 14 days after treatment.

Results:

At 24 hours - 3/6 animals in the unwashed group had corneal opacity (3/6 = 5), 6/6 iris irritation (6/6 = 5), 6/6 conjunctival redness (1/6 = 1, 2/6 = 1.5, 2/6 = 2.0, 1/6 = 2.5), 6/6 conjunctival chemosis (1/6 = 1.0, 5/6 = 1.5) and 5/6 conjunctival discharge (4/6 = 1.0, 1/6 = 1.5). At 72 hours, 1/6 had corneal opacity (1/6 = 5), no iris irritation, 5/6 conjunctival redness (4/6 = 1, 1/6 = 1.5), 3/6 conjunctival chemosis (2/6 = 1.0, 1/6 = 1.5), and 1/6 conjunctival discharge (1/6 = 0.5). At 7 days, 1/6 corneal opacity (1/6 = 2.5) and 1/6 iris irritation (1/6 = 5), all other irritation clear. On day 14 all irritation clear.

At 24 hours - 3/3 animals in the washed groups had corneal opacity (2/3 = 5, 1/3 = 7.5), 3/3 iris irritation (3/3 = 5), 3/3 conjunctival redness (1/3 = 1, 2/3 = 2), 3/3 conjunctival chemosis
(1/3 = 0.5, 1/3 = 1.5, 1/3 = 2.0), and 2/3 conjunctival discharge
(1/3 = 1.0, 1/3 = 1.5). At 72 hours, no corneal opacity or iris
irritation, or conjunctival discharge; 2/3 animals had con-
junctival redness (2/3 = 1) and 1/3 conjunctival chemosis
(1/3 = 1). At day 7, all irritation had cleared.

Study Classifier: 4

Core Minimum Data. Test substance must be clearly identified.

Toxicity Category:

II - WARNING
Page ____ is not included in this copy.
Pages 4 through 9 are not included in this copy.

The material not included contains the following type of information:

____ Identity of product inert ingredients
____ Identity of product impurities
____ Description of the product manufacturing process
____ Description of product quality control procedures
____ Identity of the source of product ingredients
____ Sales or other commercial/financial information
X _____ A draft product label
____ The product confidential statement of formula
____ Information about a pending registration action
____ FIPRA registration data
____ The document is a duplicate of page(s) ______
____ The document is not responsive to the request

The information not included is generally considered confidential by product registrants. If you have any questions, please contact the individual who prepared the response to your request.