MEMORANDUM

DATE: March 2, 1981

SUBJECT: Acme Vegetation Killer
EPA Reg. No. 33955-454

FROM: Sherrill A. Sterling
FEB/TSS

TO: Richard Mountfort
Product Manager (23)

Applicant: Acme Division
FB/Li/Corporation
300 South Third Street
P.O. Box 2276
Kansas City, Kansas 66110

Active Ingredient:
- Prometon ........................................... 3.6%
- 2,4-Dichlorophenoxyacetic acid ................ 1.0%
- Aromatic petroleum distillates ................. 76.4%
- Inert Ingredients ................................. 19.0%

Background: A Dermal Sensitization test was submitted in response to a request made when other acute data were reviewed (see Sterling 3/28 /80). The other acute exposure data were considered adequate for conditional registration purposes.

The Dermal Sensitization study was conducted by Stillmeadow, Inc. of Houston, Texas. It is under Accession Number 244288.

Recommendations:

1. The Dermal Sensitization study is considered adequate and acceptable for conditional registration purposes.

Labeling Recommendations:

1. The statement "May cause allergic skin reaction" must be added to the "Hazards to Humans and Domestic Animals" section.
2. Under "Directions for Use" please note the following:

(a) The statement "It is a violation of federal law to use this product in a manner inconsistent with its labeling" must appear on the label. The appropriate place is directly below the "Directions for Use" heading.

(b) The statement "Read Cautions First" is inappropriate and must be deleted. An alternative statement would be "Read Precautionary Statements first."

Review:

1. Guinea Pig Sensitization; Stillmeadow Project #1942-80; January 6, 1981; Acc. No. 244288

Procedure: Twenty male Hartley-albino guinea pigs were treated with 0.5 ml of a substance under occlusive wrap at days 0, 3, 5, 7, 10, 12, 14, 17, 19 and 21. In 10 of the animals, the test substance was 10% v/v solution of Acme Vegetation Killer in dionized water which was the highest non-irritating level. The remaining animals acted as a positive control with 0.05% w/v solution of 2,4-dinitrochlorobenzene in ethanol. On day 35, the animals were challenged with 0.5 ml of their respective test substances at each of two sites.

Results: At 24 hours, the positive controls showed no erythema and no edema. The test substance showed erythema at 4/10 = 1 and no edema. At Day 35, the positive controls showed erythema in 17/10 = 1, 3/20 = 2 and edema in 10/20 = 1; the test substance showed erythema in 18/20 = 1, 1/20 = 2 and 10/20 = 1 for edema. The test substance was found to be a dermal sensitizing agent.

Study Classification: Core Minimum Data. The dosage levels should be: 0.05 ml initially, 0.1 ml 3 times per week for three weeks (total = 10), wait 2 weeks and challenge. Sites should be rotated.

Toxicity Category: Dermal sensitizer
DIRECTIONS FOR USE
NOT FOR USE ON LAWNYS KILLS GRASS
Read Cautionary First!
1 Mix 1 to 1 pint per gallon of water in sprayer or sprinkler apparatus. If spray is used work at lowest possible pressure and use large pressure opening to give large droplets.
2 Apply one gallon of mixed spray per 100 square feet. On scattered weeds, walk with foliage to the ground. Full wetting is essential for prompt control. The same weeds from deep rooted perennials such as Canada Thistle and Milk weed may require repeat spraying. Make application when weeds are young and actively growing. Action is slow if ground is dry or plants wilted.
3 Apply along fence lines, gravel drives, patio blocks, and ground cover where no growth is desired. Kills grass andBroadleaf weeds. Do not use on lawns. Some species such as Oxalis may not be completely killed. Annual weeds may sprout from 3 or 4 months following treatment. Tall weeds should be cut first as the dead foliage is a fire hazard.
4. Activity is apparent on plants in a few days but final kill by root penetration may take 2 or 3 weeks. The treated area is white and any skips are noticeable so that complete coverage is easy to obtain.

PRECAUTIONARY STATEMENTS
Hazards to Humans & Domestic Animals
DANGER: Contact causes eye and skin irritation. Do not get in eyes, on skin, or clothing. Wear goggles or face shield and rubber gloves when handling. Harmful or fatal if swallowed. Do not breathe spray mist. Wash thoroughly after handling. Do not contaminate food or foodstuffs.

Statement of Practical Treatment: In case of eye contact wash with water for at least 15 minutes and seek medical attention. In case of skin contact wash with plenty of soap and water. Get medical attention if skin irritation persists if ingested. Do not induce vomiting. Drink milk, egg whites or gelatin if not available drink plenty of water. If inhaled remove victim to fresh air.

Note to Physician: There is no specific antidote if ingested. Do not induce emesis and take care to avoid aspiration of stomach contents during gastric lavage. Give a saline laxative and supportive therapy.

Environmental Hazards: This product is toxic to fish. Keep out of any body of water. Do not contaminate water used for irrigation or domestic purposes. Do not contaminate water by cleaning of equipment or disposal of wastes. Apply this product only as specified on the label.

Physical or Chemical Hazards: Do not use near open flames.

STORAGE & DISPOSAL: Do not reuse empty container. Wrap and put in trash collection. Do not store near food or foodstuffs. Do not store near fertilizers, seeds, insecticides or fungicides.

OTHER USE PRECAUTIONS: Care must be taken that none of this material falls on flower beds or edges of lawns. Do not spray over roots of valuable trees, shrubs, or grape vines. Never use a weed killer spray or equipment to apply to insects or fungicides. Do not use same spray equipment to apply herbicides or fungicides. Do not use same spray equipment for other purposes. Avoid spray drift to vegetables, flowers, ornamentals, or other desirable plants. Do not use fine mist sprays. Coarse sprays are less likely to drift away from target area.

ONE PINT COVERS 133 SQ. FT.
ACTIVE INGREDIENTS:
- Prometon (2, 4-diisopropylamino) 3.6%
- 6-methoxy s-triazine 3.0%
- 4 Dichlorophenoxyacetic acid 1.0%
- Aromatic petroleum distillates 76.4%

INERT INGREDIENTS 19.0%
TOTAL 100.0%

U.S. Patent 2,909,420 ('Prometon')

Keep Out of Reach of Children
DANGER
See Back Panel for Other Precautions and Statement of Practical Treatment

NET CONTENTS ONE PINT