DATE: June 15, 1981

SUBJECT: Weed-B-Gon Intermediate
EPA File Symbol: 239-EULL

FROM: Sherell A. Sterling
PHB/TSs

TO: Richard Mountfort
Product Manager (23)

Applicant: Chevron Chemical Company
Ortho Agricultural Chemicals Division
940 Hensley Street
Richmond, CA 94804

Active Ingredients:
- Dimethylamine salt of MCPP .......................... 34.0%
- Dimethylamine salt of 2,4-D .......................... 31.8%
- Inert Ingredients ..................................... 34.2%

Background: Acute Oral, Acute Dermal, Eye and Skin Irritation studies were submitted in support of the conditional registration for this product. These studies were conducted at the Environmental Health Toxicology Labs of Standard Oil of California. The "cite-all" method of support was chosen.

Recommendations:

1. The Acute Oral study is considered adequate and acceptable for conditional registration purposes. For future submissions, please note that results of all necropsies must be included in the report.

2. The Acute Dermal study is considered adequate and acceptable for conditional registration purposes. Response data (including erythema and edema) must be reported in tabular form.

3. An Acute Inhalation study was not submitted with this application. This study is necessary since the substance is a liquid. The applicant has agreed to submit this study when completed (late 1981).

4. The Eye Irritation study is considered adequate and acceptable for conditional registration purposes.

5. The Skin Irritation study is considered adequate and acceptable for conditional registration purposes.

Labeling Recommendations:

1. Based on the Eye Irritation study, the appropriate signal word is DANGER.
2. The "Hazards to Humans and Domestic Animals" statement must be revised as follows (or similarly):

DANGER, Corrosive. Causes irreversible eye damage and skin irritation. Harmful if swallowed or inhaled. Do not get in eyes, on skin, or on clothing. Wear goggles or face shield, and rubber gloves when handling. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse. Avoid breathing vapors.

3. The "Statement of Practical Treatment" must be revised as follows:

**If in eyes:** Flush with plenty of water. Get medical attention.

**If on skin:** Wash with plenty of soap and water. Get medical attention.

**If swallowed:** Drink promptly a large quantity of milk, egg whites, gelatin solution, or if these are not available, drink large quantities of water. Avoid alcohol. Get medical attention.

**NOTE TO PHYSICIAN:** Probable mucosal damage may contraindicate the use of gastric lavage. Emergency information - call (415) 233-3737.

4. The "Environmental Hazards" must be revised as follows:

"This product is toxic to fish. Do not apply directly to water. Do not contaminate water by cleaning of equipment or disposal of wastes."

5. The "Storage and Disposal" statement must be revised according to the enclosed information sheets.

Review:

1. The Acute Oral Toxicity of Weed-B-Gon Intermediate; Report #SOCAL 1779; May 1, 1981; Acc. No. 245070.

**Procedure:** Groups of Sprague-Dawley rats, each with either 5M (232-305g) or 5F (202-246g), were given single doses of "Weed-B-Gon Intermediate" intragastrically. Males received dosages of 1.0-5.0 g/kg; females were dosed at 0.39-2.0 g/kg. Animals were observed for 14 days. All animals were subjected to necropsies.

**Results:** The LD50 for males was 1.7 with a 95% confidence range of 1.2-2.5 g/kg. The female LD50 was 0.89 g/kg with a 95% confidence range of 0.64-1.2 g/kg. Symptoms included: weakness, ataxia, collapse,
moribund, salivation, decreased motor activity, reduced food intake; diarrhea, hematuria. Necropsy revealed: reddened GI tract, red nasal discharge, dark brown glands and hollow kidneys (per summary, latter 2 not related to study).

Study Classification: Core Minimum Data. Generally, equal numbers of males and females must be tested at each dosage level. Only summary of necropsy included; individual reports should be included.

Toxicity Category: III-Caution

2. The Acute Dermal Toxicity of Weed-B-Gon Intermediate; Report #SOCAL 1778; April 15, 1981; Acc. No. 245070.

Procedure: A group of 5M (2.47-2.76 kg), 5F (2.01-2.85 kg) New Zealand white rabbits were treated with 5 g/kg of "Weed-B-Gon Intermediate" at abraded skin sites. Subsequently, groups of F received single doses from 1.0-3.3 g/kg. Exposure was for 24 hours under occlusive wrap. Animals were observed for 14 days post-dosing. All animals were subjected to necropsy.

Results: No mortalities in M at 5.0 g/kg. LD50 for F was 3.1 g/kg with a 95% confidence range of 1.1-8.5 g/kg. Symptoms (reported for F only) included: weak, loose stools, collapse, decreased motor activity, reduced food consumption, ataxic. Most treated animals had moderate to severe erythema and edema at 24 hours. Necropsy revealed: dry, thickened, or necrotic skin in many treated animals; small white cysts in livers of 1 treated and 1 control animal.

Study Classification: Core Minimum Data. Observations were reported in summary; individual reports must be included.

Toxicity Category: III-Caution

3. The Eye Irritation Potential of Weed-B-Gon Intermediate; Report #SOCAL 1777; April 20, 1981; Acc. No. 245070.

Procedure: 9 New Zealand white rabbits each received 0.1 ml of "Weed-B-Gon Intermediate" in one eye. Three eyes were subsequently rinsed for one minute with 250 ml of distilled water, 30 seconds post-treatment. Draize scoring at 1, 2, 3, 7, 10, 14 and 21 days.

Results: The unwashed eyes at 24 hours exhibited corneal opacity in 3/6 = 60, 3/6 = 80; iris irritation in 4/6 = 5; redness in 1/6 = 2, 5/6 = 3; chemosis in 1/6 = 2, 2/6 = 3, 3/6 = 4; discharge in 6/6 = 3; corneal sloughing noted in 2/6. By day 21, corneal opacity noted in 1/6 = 5, 1/6
= 30, 1/6 = 40, 3/6 = 80, iris irritation in 1/6 = 5 with 3/6 unable to
score due to opacity; redness in 2/6 = 1, 2/6 = 2; chemosis in 1/6 = 1,
3/6 = 2; discharge in 1/6 = 1 and 3/6 = 2.

The washed eyes at 24 hours exhibited corneal opacity in 2/3 = 60, 1/3 = 80
and 2/3 with corneal sloughing; iris irritation in 2/3 = 5; redness in 1/3
= 2, 2/3 = 3; chemosis in 2/3 = 3, 1/3 = 4; discharge in 3/3 = 2. At day
21, corneal opacity in 2/3 = 80; iris irritation couldn't be scored in
2/3; redness in 2/3 = 1; chemosis in 2/3 = 1; discharge in 1/3 = 1, 1/3 =
2.

Necropsy of 3 animals (2 unrisned, 1 rinsed) showed disruption and erosion
of corneal epithelium; corneal stroma edematous; neovascularization with
inflamed infiltrate; anterior synechia.

Study Classification: Core Guideline Data.

Toxicity Category: I-DANGER

4. The Skin Irritation Potential of Weed-B-Gon Intermediate; Report # SOCAL
1776; February 20, 1981; Acc. No. 245070.

Procedure: 6 New Zealand white rabbits with 2 intact and 2 abraded sites
per animal received 0.5 mL of "Weed-B-Gon Intermediate" at each site.
Draize scoring at 24, 48, 72 hours; 7 days.

Results: At 24 hours, intact sites exhibited erythema at 7/12 = 3, 5/12 =
4; edema at 3/12 = 3, 9/12 = 4. Abraded sites at 24 hours showed erythema
in 5/12 = 3, 7/12 = 4; edema at 2/12 = 3, 10/12 = 4. At 72 hours, intact
sites showed erythema in 1/12 = 1, 3/12 = 2, 8/12 = 3; edema at 4/12 = 1,
8/12 = 2. The Primary Irritation Index was 5.8.

Study Classification: Core Guideline Data.

Toxicity Category: II-WARNING

7/12 = 2, 1/12 = 3. Abraded sites by 72 hours
exhibited erythema in 1/12 = 1, 3/12 = 2, 5/12 = 3;
edema at 4/12 = 1,
PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS & DOMESTIC ANIMALS

DANGER
Toxic to eyes. Causes eye damage. Do not get in eyes. Wear goggles or face shield when handling concentrate. Harmful if swallowed. Avoid contact with skin or clothing. Avoid ingesting vapors. Wash skin with plenty of soap and water. Get medical attention immediately in case of skin contact. Wash eyes with fresh water for 15 minutes and get medical attention if swallowed. Promptly drink a large quantity of water and induce vomiting. Get medical attention immediately in case of skin contact. Other health hazards: Immediate hazard to aquatic life. Refer to specific Ortho formulas for detailed information. Products formulated with WEED-B-GON Intermediate may require registration with the Environmental Protection Agency.

ENVIRONMENTAL HAZARDS
This product is toxic to fish, reptiles, and birds. Do not contaminate water by cleaning at equipment or disposal of waste.

DIRECTIONS FOR USE
It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

READ ENTIRE LABEL USE STRICTLY IN ACCORDANCE WITH PRECAUTIONARY STATEMENTS AND DIRECTIONS. AND WITH APPLICABLE STATE AND FEDERAL REGULATIONS.

STORAGE AND DISPOSAL

PROHIBITIONS
Do not contaminate water, food, or feed by storage, disposal or cleaning of equipment. Open dumping is prohibited.

STORAGE
DO NOT USE in equipment or store in containers in which other agricultural chemicals will be handled. DO NOT handle or store near plants, seeds, fertilizer, insecticides or fungicides.

PESTICIDE DISPOSAL
Pesticide, spray mixture, or rinsate that cannot be used or chemically reprocessed should be disposed of in a landfill approved for pesticides or buried in a safe place away from water supplies.

CONTAINER DISPOSAL
Reseal container and offer for reconditioning, or triple rinse (or equivalent) and offer for recycling, reconditioning, or disposal in approved landfill, or bury in a safe place.

GENERAL
Consult federal, state or local disposal authorities for approved alternative procedures.

ACTIVE INGREDIENTS:
*Dimethylamine salt of 2-(2-Methyl-4-chlorophenoxy)propionic acid.......................... 34.0%
**Dimethylamine salt of 2,4-Dichlorophenoxyacetic acid.................. 31.8%
Inert Ingredients.................................................. 34.2%
*Equivalent to 28.1% 2-(2-Methyl-4-chlorophenoxy)propionic acid and 26.4% **2,4-Dichlorophenoxyacetic acid or 2.78 lbs./gal. of 2-(2-methyl-4-chlorophenoxy)propionic acid and 2.62 lbs./gal. of **2,4-Dichlorophenoxyacetic acid per U.S. gallon at 60°F.
**Isomer specific by A.O.A.C. Method No. 6.D01-5.

KEEP OUT OF REACH OF CHILDREN

DANGER
See Side Panels for Additional Precautionary Statements

NET CONTENTS

Manufactured for
Ortho Chemical Company
Ortho Agricultural Chemicals Division
San Francisco, Ca. 94119  Richmond CA 94804
Product 4651  Made in U.S.A.
Form 9525-A  EPA Est. 32155AL-1
EPA File Symbol 239-NEW