UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE: January 21, 1982
SUBJECT: EPA Registration Number 539-28
        Turf Builder Plus 2
FROM: Deloris F. Graham
       FHB/TSS
TO: Richard Mountfort
    Product Manager (23)

Applicant: O. M. Scott & Sons Company
           Marysville, OH 43041
           Attention: Michael P. Kelty

Active Ingredients:
2,4-Dichlorophenoxyacetic acid ...................................... 0.99%
2-(2-Methyl-4-chlorophenoxy)propionic acid ............................ 0.99%
Inert Ingredients .................................................................. 98.02%

Background

Submitted two Eye Irritation Studies to support change in signal word from
"WARNING" to "CAUTION." Alternate method of support. Data under accession
number 246437.

Recommendation

(1) FHB/TSS finds these studies acceptable to support conditional
registration of this product.

(2) Based on the Eye Irritation Studies submitted, the appropriate signal
word is "CAUTION."

Label

(1) The statements "Do not contaminate feed or foodstuffs. Do not graze
    treated areas. Do not feed clippings to livestock" must be deleted from
    precautionary statement and placed under "Directions for Use."

(2) The statement "Do not contaminate water used for irrigation or domestic
    purposes" must be deleted from precautionary statement and placed under
    "Environmental Hazards."

Review

(1) Eye Irritation Study: Raltech Scientific Services, Inc.; Lab. No.
Procedure: Nine rabbits received 0.1 ml of the test material in one eye each. The eyes of three of the rabbits were washed for one minute, 30 seconds posttreatment. Observations made at 24, 48, and 72 hours and 7 days.

Results: At 24 hours, 6/6 animals of the unwashed group had corneal opacity (5/6=5, 1/6=10); 5/6 iris irritation (5/6=5); 6/6 conjunctive redness (1/6=1, 5/6=2); chemosis (3/6=1, 3/6=2); discharge (2/6=1, 4/6=2).

At 72 hours, 3/6 had corneal opacity (3/6=5); 4/6 redness (4/6=1); 2/6 chemosis (2/6=1). At day 7, corneal opacity and conjunctive irritation had cleared.

At 24 hours, in washed group 1/3 had corneal opacity (1/3=5); iris irritation (1/3=5); 3/3 redness (2/3=1, 1/3=2); chemosis (3/3=1); discharge (3/3=1). All irritation clear by 48 hours.

Study Classification: Core Guideline Data

Toxicity Category: III - CAUTION

(2) Eye Irritation Study: WARP Institute; Study No. 7082554.

Procedure: Nine rabbits received 0.1 ml of the test material in one eye each. The eyes of three of the rabbits were washed for one minute, 20 seconds posttreatment. Observations made at 24, 48, and 72 hours.

Results: At 24 hours, no corneal opacity or conjunctive irritation present, and remained clear through 72 hours.

Study Classification: Core Guideline Data

Toxicity Category: IV - CAUTION
Page _____ is not included in this copy.

Pages 3 through 8 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
__ A draft product label
__ The product confidential statement of formula
__ Information about a pending registration action
__ FIFRA 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.