UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

3-18-94

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MEMORANDUM:

Subject: EPA File Symbol/EPA Reg. No.: 228-181
Triamine Lawn Weed Killer

From: Fred Johnson Jr., Biologist
Precautionary Review Section
Registration Support Branch
Registration Division (H7505W)
10/27/93

To: Joanne I. Miller, PM 23
Fungicide-Herbicide Branch
Registration Division (H7505C)

Thru: Thomas C. Ellwanger, Section Head
Precautionary Review Section
Registration Support Branch
Registration Division (H7505W)
Mary Waller for T.E. 3/18/94

Applicant: Riverdale Chemical Company
425 West 194th Street
Glenwood, IL 60411-3699

FORMULATION FROM LABEL:

Active Ingredient(s):	% by wt.
Dimethylamine Salt of 2,4- Dichlorophenoxyacetic Acid.....	2.28%
Dimethylamine Salt of 2-(2-Methyl-4-chlorophenoxy) propionic Acid.....	2.29%
Dimethylamine Salt of 2-(2,4-Dichlorophenoxy) propionic Acid	2.27%
Inert Ingredient(s):	93.16%
Total:	100.00%

BACKGROUND

Riverdale Chemical Company has submitted a request for reconsideration of a previously denied request to remove the eye protection requirements after product dilution from labeling for product, Triamine Lawn Weed Killer, REGNO 228-181. The registrant submits data which compares Active Ingredients between an undiluted Triamine™ product, REGNO 228-211, having approximately threefold percent of active ingredient and the highest level of use diluted Triamine Lawn Weed killer, REGNO 228-181. The registrant contends that the diluted lawn weed killer has less active ingredient, thereby, less toxicity and feels that this is " sufficient and bridgeable" data to permit the removal of the eye protection requirement after product dilution.

RECOMMENDATION

PRS finds that the registrant's request for reconsideration to remove the eye protection requirements from labeling for product, Triamine Lawn Weed Killer, REGNO 228-181 is acceptable only for when applying after dilution. The submitted data supports the registrant's contention that the most concentrated dilution, for use, of REGNO 228-181, Category II, is sufficient to allow the data from REGNO 228-211, Category III to be cited. Acceptance of the cited data, MRID 403673, does not include the removal of the eye protection labeling for when mixing and loading prior to dilution. The registrant must, however, submit an acute dermal toxicity study. Based on the contents of the registration jacket it appears that this requirement has never been satisfied.

ACUTE TOXICITY PROFILE

* Acute Oral.....Category 3/G
\- Acute Dermal.....Not satisfied
* Acute Inhalation.....Category 3/M
*** Eye irritation.....Category 2/M
* Dermal irritation.....Category 4/G
** Dermal Sensitization.....Not a Sensitizer -/G

* M. Waller review, 7/9/85

** M. Waller review, 7/2/87

*** M. Perry review, 1/31/93

\- Category III per letter to file 10/21/85, R. Mountfort. No data evident to support classification.

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LABELING

1. The signal word is "Warning".

2. The Precautionary Statements should read:

   " Causes substantial but temporary eye injury. Harmful if swallowed, inhaled or absorbed through skin. Do not get in eyes or clothing. Wear goggles, face shield or safety glasses. Avoid breathing spray mist and contact with skin. Wash thoroughly with soap and water. Remove contaminated clothing and wash before reuse. After product has been diluted in accordance with the 'Directions For Use' below , goggles, face shield or safety glasses are not required."

3. The Statements of Practical Treatment should read:

   "If in eyes: Hold eyelids open and flush with a steady gentle stream of water for 15 minutes. Get medical attention."

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

   "If swallowed: Call a physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person."

   "If inhaled: Remove victim to fresh air. If not breathing, give artificial respiration, preferably, mouth to mouth. Get medical attention."

4. Since this product is intended for residential use, it meets the restricted use criteria. The PM Team should decide if alternative labeling is sufficient to offset the need for restricted use classification and the hazards posed by this product.