2073

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

CASWELL FILE

OCT 27 1986

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Trichlorfon - Request for Waiver of Acute Toxicity Data - Dylox 80 Concentrate
EPA Accession No. 262471
ID No. 3125-GTR

Caswell No. 385

FROM: Irving Mauer, Ph.D. 10/24/86
Toxicology Branch
Hazard Evaluation Division (TS-769C)

TO: William H. Miller/Gary Otakie, PM Team 16
Insecticide-Rodenticide Branch
Registration Division (TS-767C)

THRU: Jane E. Harris, Ph.D. JEH 10/24/86
Head, Section IV
Toxicology Branch
Hazard Evaluation Division (TS-769C)
10/26/86

Registrant: Mobay Chemical Corporation, Kansas City, MO.

Action Requested (161):

By letter of April 18, 1986, the registrant requests a waiver for submission of acute toxicity data to support registration of a new formulation of trichlorfon, Dylox 80 Concentrate, for use as a Manufacturing-Use Product (MP), as required by Table B of the Trichlorfon Reregistration Standard, dated June 30, 1984.

Background:

The acute toxicity data required for MP's in the Standard were the following:

81-3: Inhalation LC_{50} - rat;
81-4: Primary eye irritation - rabbit;
81-5: Primary dermal irritation - rabbit; and
81-6: Dermal sensitization - guinea pig.

page 2: Inert ingredient information deleted.

The registrant has satisfied all these requirements for technical trichlorfon (see Table A of the Standard), and requests extrapolation of the Agency's evaluation and toxicity grading (Toxicity Category II for inhalation, III for eye and dermal irritation, and moderate skin sensitizer) to this new formulation, noting:

Inert Ingredient Information

1. This formulation contains, in addition to the technical (82%), [redacted]

2. The small percentages of the other inerts [redacted] are unlikely to adversely affect eyes and skin.

3. The Agency has already ". . . agreed that the data on the technical could be extrapolated to DYLOX 80% SPA, a similar product" (Miller to Mobay, letter dated October 3, 1985).

TB Conclusions:

Toxicology Branch (TB) agrees with Registration Division's (RD's) previous recommendations to establish the same toxicity categories for the current MP, DYLOX 80 CONCENTRATE, as for the similar formulation, DYLOX 80 SPA, based upon adequate data for technical trichlorfon, namely, assigning Toxicity Category II for inhalation, III for primary dermal irritation, and "moderate sensitizer" for skin sensitization. On the other hand, TB is concerned about the effects on mucous membranes acknowledged by the registrant, and consequently recommends submission of data on the extent of potential acute eye effects (TOX. CAT.), i.e., a study on primary eye irritation (81-4) for DYLOX 80 CONCENTRATE. Providing Residue Chemistry Branch concurs with the submission of Product Chemistry data (Accession No. 262471, "Dylox 80 Concentrate Brochure No. 1447," dated March 28, 1986), TB has no objection on other toxicological concerns at this time.

cc: RCB