New toxicity data on "Hertect LSP," EPA File
Symbol no. 1310.

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Product Manager

By letter of 3/24/75, R. R. Buck of Merck Sharp & Dohme to E. M. Wilson,
EPA, two studies said to be requested by "Dr. Douglas Campt's Letter of
November 4, 1974," are submitted. These are described below:

1) LC_{50} Inhalation in Rats (Wells Labs., Inc., Jersey City, N. J.,
2/5/75).

Sample: An opaque, pink viscous liquid, identified as: Hertect LSP,
Lot 04-05-A-4, Sample #75RTS110, received 2/11/75.

Procedure: As described in the Hazardous Substances Labeling Act,
Part 191, Chapter 1, Title 21, CFR Par. 101.1.

Results: Ten rats each/group had "dose" of 50,100,20, 1,000, 2,000,
or 2,200 mg/l/hr. No toxic effect was produced. All rats
survived.

Conclusion: It was concluded that further work with increased dosage
was not warranted.

2) Eye Irritation Testing in Rabbits (Well Labs., Inc., Jersey City
N. J., 2/20/75).

Sample: Same as used in (1), above.

Procedure: Cf. "Appraisal of Safety of Chemicals in Foods, Drugs,
and Cosmetics," published by Assoc. Food Drug Officials
of the U.S.

Results: Groups of three rabbits each were given 0.5 ml test substance
in one eye. One eye either kept "as is" or had test material
washed out with 20 ml warm water at either two or four seconds
after test material was instilled. The individual Draize
scores (for daily intervals through 7 days) are detailed for
each of the nine rabbits. Values (total) for each "unwashed
eye" at 1 day are 6 (score of 1 each for redness, chemosis,
and discharge in conjunctivae, added and multiplied by 2).
All other scores for all the rabbits are each zero.
Conclusion: Only minimal conjunctivitis was produced in the unwashed eyes of the three rabbits. There was an irritation in washed eyes (six rabbits).

Comment: We assume Registrant-applicant refers to EPA File Symbol No. 618-1U-84, in conjunction with PP No. 4F1513. Our (TB) evaluation of the former was originally made on October 11, 1974.

CONCLUSIONS:

1) The two tests submitted satisfy all requirements for information in our (TB) previous (10/11/74) evaluation of Mertect LSP, EPA File Symbol No. 618-1U-84.

2) The negative irritation shown by "washed eyes" and the minimal conjunctivitis in "unwashed eyes" and the low acute inhalation toxicity to rat (LC50 exceeds 2,200 mg/l/hr) of this formulation agree with the proposed cautionary wording on the label "CAUTION. Keep out of reach of children. HARMFUL IF SHALLOWED. Do not get in eyes or in skin. In case of contact, flush with water. For eyes, get medical attention."

3) TB withdraws its objections to registration of Mertect LSP Fungicide, EPA File Symbol No. 618-1U-84.

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cc: Branch Reading File
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Initial O.E Paynter