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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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OFFICE OF
PESTICIDES AND TOXIC SUBSTANCESMEMORANDUM

SUBJECT: ID# 37100-7: DIMILIN
Registrant Request to Remove Phrase: "Avoid Contact with Skin" on 25WP Dimilin.

TOX Chem No.: 346A
Project No.: 9-1897
Record No.: 249106

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Review Section II
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Conclusion

If the phrase "Avoid contact with skin" was solely due to the dermal toxicity category, it would not be necessary, however in this case it is part of the labelling requirements, independent of toxicity category.

Data indicate that Dimilin is a skin sensitizer and labeling on Dimilin formulations must reflect that the formulation contains a known sensitizer. Therefore the appropriate statement for sensitization should be placed on the label for 25WP Dimilin.

Comments:

1. The acute dermal toxicity of the 25WP Dimilin formulation was shown to be relatively acutely nontoxic (Tox Cat IV).

2. The technical Dimilin caused dermal sensitization in the guinea pig test. This is germane to any Dimilin formulation.

3. The 25WP formulation did not elicit a sensitizing effect when tested. However, as is often the case longer term exposure to lower doses may also evoke the sensitizing reaction. Therefore, the label providing a warning of possible dermal sensitization is required as well as the method to avoid it.