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

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OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

AUG 21 1986

MEMORANDUM

SUBJECT: EPA Registration Number 3125-318
Bayleton 25% Wettable Powder

FROM: Mary L. Waller
Technical Support Section
Fungicide-Herbicide Branch
Registration Division (TS-767C)

mw E 8/29/86

TO: Henry M. Jacoby, PM 21
Fungicide-Herbicide Branch
Registration Division (TS-767C)

APPLICANT: Mobay Chemical Corporation
Agricultural Chemical Division
1140 Connecticut Avenue, Suite 604
Washington, DC 20036

ACTIVE INGREDIENT:
1-(4-chlorophenoxy)-3,3-dimethyl-1-(1H-1,
2,4-triazole-1-yl)-2-butanone 25%
INERT INGREDIENTS: 75%

BACKGROUND:

The registrant has requested a labeling amendment proposing a revision of the precautionary statements and a change in the signal word from "WARNING" to "CAUTION." The registrant has submitted a one-page explanation and cited Accession Numbers of data used to support this registration.

RECOMMENDATION:

FHB/TSS classifies the primary eye irritation study as Category III. FHB/TSS has also reviewed an earlier review of the data used to support this registration (memorandum dated February 15, 1978 from J.D. Doherty to E. Wilson) and finds the signal word should be "CAUTION."

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The Product Manager should inform the registrant that when conducting future primary eye irritation studies, the observation period should be carried out to 21 days or until all irritation clears.

LABELING:

1. The proposed precautionary statements should be revised as follows:

   Harmful if swallowed, inhaled or absorbed through skin. Causes eye irritation. Avoid breathing dust. Avoid contact with eyes, skin or clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

2. Remove the following sentence from the precautionary statements and place the sentence immediately above the "CAUTION" signal word:

   KEEP OUT OF REACH OF CHILDREN

3. The "STATEMENTS OF PRACTICAL TREATMENT" should read as follows:

   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 IN EYES: Flush with plenty of water. Call a physician if irritation persists.

   IF ON SKIN: Wash with plenty of soap and water. Get medical attention.

REVIEW:

(1) Primary Eye Irritation Study: Chemagro Agricultural Division, Mobay Chemical Corporation, Research and Development; Report No. 53105; May 10, 1977.

PROCEDURE:

Prior to testing, nine New Zealand White rabbits were examined using fluorescein stain to ensure that the animals were free of any ocular defect or irritation. Each animal then received 50 mg of test material which was instilled in one eye of each animal. The other eye served as a control. The treated eye of 3/9 animals was washed with 200 ml of tap water 45 seconds after treatment. Eye irritation was scored at 24, 48, and 72 hours and at 4 and 7 days.

RESULTS:

Eye irritation in the washed group was scored as follows: at 24 hours, conjunctivae redness (2/3 = 1), and discharge (2/3 = 1); and at 7 days, all irritation had cleared.

Eye irritation in the unwashed group was scored as follows: at 24 hours, corneal opacity (1/6 = 10), iris irritation (1/6 = 5), conjunctivae redness (1/6 = 2, 5/6 =), chemosis (1/6 = 2, 2/6 = 1) and discharge (3/6 = 2, 3/6 = 1); and at 7 days, conjunctivae redness (1/6 = 1).

STUDY CLASSIFICATION:

Core Minimum Data - See comments under Recommendation.

TOXICITY CATEGORY: Category III - CAUTION.

RIN 5711-93

TRIADIMEFON TOX REVIEWS

Page 4 is not included in this copy.

Pages _____ through _____ are not included.

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 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.
