rec'd 7/23
Carlie Kelly

MEMORANDUM

SUBJECT: EPA Reg. No./File Symbol 55947-RUU
Barricade F Herbicide

FROM: William S. Woodrow WSW 7-23-92
Precautionary Review Section
Registration Support Branch
Registration Division (H75-05C) E 7/23/92

TO: J. Miller / E. Wilson (PM 23)
Fungicide - Herbicide Branch
Registration Division (H75-05C)

APPLICANT: Sandoz Agro, Inc.
1300 East Touhy Ave
Des Plaines, IL 60018

FORMULATION FROM LABEL:

Active Ingredient(s):	% by wt.
Prodiamine [N^3, N^3-Di-n-propyl-2,4-dinitro-6-(trifluoromethyl)-m-phenylenediamine	2.0
Inert Ingredient(s):	98.0
Total	100.0%

MEMORANDUM

Subject: Company questions (Sandoz) concerning a 5-25-92 acute toxicity studies reviewed 5-28-92. (55947-RUU Barricade F Herbicide)

FROM: William S. Woodrow, Ph.D.
Precautionary Review Section
Registration Support Branch
Registration Division (H7505C)

TO: J. Miller / Eugene Wilson
Fungicide-Herbicide Branch
Registration Division (H75-05C)

THRU: Thomas Ellwanger, Ph.D
Precautionary Review Section Head
Registration Support Branch
Registration Division (H7505C)

Item: Eye Irritation Study. Lab No. 9010870/SNC 110/SE. MRID NO. 422088-15.

The Co. objects to "Causes moderate eye

injury (irritation), under Precautionary Statements.

Sandoz states that 40CFR presents "Avoid contact with skin, eyes or clothing. In case of contact immediately flush eyes or skin with plenty of water. Get medical attention if irritation persists.

Eye study - eye irritation (conjunctival) redness persisted through day 4, chemosis and discharge continued through day 2. This irritation response requires toxicity category 3 designation - therefore, under Precautionary Statements, "Causes moderate eye injury (irritation) must appear.

The Agency prefers that some cautionary statements should appear under a paragraph entitled "Precautionary Statements", and another paragraph heading "Statements of Practical Treatment"

Regarding precautionary labeling statements for the eye -

"Avoid contact with skin, eyes or clothing" should appear under Precautionary Statements. Under Statements of Practical Treatment, the following should appear:

If in eyes: Flush with plenty of water. Call a physician if irritation persists.

Item: Skin irritation - The Co. objected to the addition of "get medical attention, to the If on skin Practical treatment Statement.

The Registrant is correct in stating that the skin irritation study was designated toxicity category 4, however the acute dermal toxicity study employed a 2.0g/kg dose per animal. Dosages ranging from 2.0g/kg through 5.0g/kg require an acute dermal toxicity category of 3 (the maximum dose of Barricade F was 2.0g/kg).

Therefore "Get medical attention" must be added to the "If on skin" Statement of Practical Treatment.

Item: Agency acceptance of the Barricade F dermal sensitization study. Lab. No. 90112-4D/SNC/111/SS, MRID NO. 422085-17.

This study will remain classified as Supplementary (unacceptable) data; consequently a new sensitization study will be required.

Regarding selection of an adequate test material concentration to use for the induction and challenge phases of a dermal sensitization study:

If the tester desired to test the Barricade F, Herbicide powder product at a maximum level using the Alembical D, approximate doses of 0.5 g per animal should have been applied to animal skin (shaved), and then moistened with approx. 0.5ml of the Alembical D.

It is interesting to note that the dermal sensitization study completion date was 11-30-90, and that in the stated results for the preliminary range finding, the induction

and challenge results were all scored 0. Guinea pigs were exposed at each induction interval (q) for 6 hours.

Whereas the skin irritation study completed 11-2-90 (28 days prior to the sensitization study completion) used six rabbits exposed for four hours to 0.5 g test material powder moistened with 0.5 ml of distilled water, exhibited 1.0 scoring for erythema and for edema.

The results of the skin irritation study should have provided direction for the tester to use the test product powder applied to skin and moistened with water (not diluted) for induction purposes. A dilution of test material powder using water could have been used for the challenge phase.

IT SHOULD BE NOTED THAT LABELING STATEMENTS USED FOR SEVERAL YEARS IN FRS ARE TAKEN FROM FEDERAL REGISTER, VOL 49, NO. 188/ WEDNESDAY, SEPTEMBER 26, 1984/ PROPOSED RULES RATHER THAN 40 CFR.

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