MEMORANDUM

DATE: November 13, 1981

SUBJECT: Du Pont Glean Weed Killer, EPA Experimental Use Permit No. 352-EUP-105 - Review of Toxicology Studies.

FROM: Charles Frick, Toxicologist Toxicology Branch/HED (TS-769)

TO: Robert Taylor (25) Registration Division (TS-767)

THRU: William Burnam, Acting Chief Toxicology Branch/HED (TS-769)

Response to points raised in the letter from James Trexel of Du Pont concerning acceptability of certain toxicology studies on the product Glean. (copy returned with this memorandum)

Point 1: Primary Skin Irritation and Sensitization Tests on Guinea Pigs; Haskell Laboratory Report No. 794-76.

Toxicology Branch concurs with Mr. Trexel and this study has been elevated to core guideline and will support registration.

Point 2: Eye Irritation Study; Haskell Laboratory Report No. 744-76.

This study was reviewed and classified as supplementary because of the quantity of test material used (10 mg) and the number of animals tested (2 rabbits). This study was correctly classified as core supplementary. While rechecking this study, another study was located (Haskell No. 13,402, Report No. 130-80) titled Eye Irritation in Rabbits and tested the DPX-4189 formulated product. This study has been reviewed and found to adequately describe the eye irritation potential of this material and will support registration. This review has been included into the DPX-4189 data base. Why this study was missed is not known but it would seem to have been missed by Mr. Trexel as he also refers to Study No. 744-66.
Point 3: Teratology Study (Rat); Haskell Laboratory Report No. 583-78.

Toxicology Branch would like to review the Rabbit Teratology Study HLO-534-80 before considering changing the status of the Rat Teratology Study. This study was mentioned in Mr. Trexel's letter but, has not to this reviewer's knowledge been submitted to Toxicology Branch.

A copy of this memorandum and the eye irritation study review (Report No. 130-80) will be incorporated into the Glean data file.

Attachment