MEMORANDUM

Subject: Name of Pesticide Product: Penoxsulam Technical  
EPA Reg. No./File Symbol: 62719-U00  
DP Barcode: 305211  
Decision #: 211688  
PC Code: 119031  
Benzenesulfonamide, 2-(2,2-difluoroethoxy) -N-(5,8-dimethoxy[1,2,4]triazolo[1,5c]pyrimidin-2-yl) -6(trifluoromethyl) (DE-638, Penoxsulam)

From: Tracy Keigwin  
Technical Review Branch  
Registration Division (7505C)

To: Philip Errico, PM 23  
Herbicide Branch  
Registration Division (7505C)

Applicant: Dow AgroSciences LLC  
9330 Zionsville Road  
Indianapolis, IN 46268
FORMULATION FROM LABEL:

Active Ingredient(s): 119031 Penoxsulam

Inert Ingredient(s): 2

Total: 100%

ACTION REQUESTED: PM requests review of response from Dow AgroSciences LLC with regard to EPA File Symbol 62719-UOO.

BACKGROUND: Dow AgroSciences LLC has submitted a response to our review concerning EPA File Symbol 62719-UOO. The acute inhalation toxicity study (MRID 45830818) submitted to support the registration of this product was found unacceptable due to unusual study results. The response from Dow rebutted the previous review and provided an explanation for the erroneous result in the acute inhalation study.

RECOMMENDATIONS: The rebuttal from Dow was thorough and acceptable for EPA File Symbol 62719-UOO. We will accept the explanation for the differences in nominal and gravimetric concentrations for the acute inhalation study submitted in support of EPA File Symbol 62719-UOO (MRID 45830818) and will agree to a toxicity 4 classification for acute inhalation toxicity for MRID 45830818.

The acute toxicity profile for EPA File Symbols 62719-UOO is as follows:

<table>
<thead>
<tr>
<th>Toxicity</th>
<th>Category</th>
<th>Acceptability</th>
<th>MRID</th>
</tr>
</thead>
<tbody>
<tr>
<td>Acute oral toxicity</td>
<td>IV</td>
<td>Acceptable</td>
<td>MRID 45830812</td>
</tr>
<tr>
<td>Acute dermal toxicity</td>
<td>IV</td>
<td>Acceptable</td>
<td>MRID 45830815</td>
</tr>
<tr>
<td>Acute inhalation toxicity</td>
<td>IV</td>
<td>Acceptable</td>
<td>MRID 45830818</td>
</tr>
<tr>
<td>Primary eye irritation</td>
<td>IV</td>
<td>Acceptable</td>
<td>MRID 45830820</td>
</tr>
<tr>
<td>Primary skin irritation</td>
<td>IV</td>
<td>Acceptable</td>
<td>MRID 45830823</td>
</tr>
<tr>
<td>Dermal sensitization</td>
<td>No</td>
<td>Acceptable</td>
<td>MRID 45830826</td>
</tr>
</tbody>
</table>
PRECAUTIONARY STATEMENTS: EPA File Symbols 62719-UOO:

No precautionary labelling is required since this product is category IV for all routes of exposure and is not a dermal sensitizer. The precautionary labelling and first aid statements on the provided label are acceptable.

Although this product does not fall within the scope of the Worker Protection Standard, we recommend that the following (minimally) appear on the label:

**Handlers of this product must wear:**
- Long Sleeve Shirt
- Long Pants
- Socks
- Shoes