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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

SEP 16 1987

MEMORANDUM

SUBJECT: EPA Registration No. 359-706
Aliette

FROM: Deloris F. Graham *DFG 9/22/87*
Technical Support Section
Fungicide-Herbicide Branch
Registration Division (TS-767C) *E 9/22/87*

TO: Lois A. Rossi, PM 21
Fungicide-Herbicide Branch
Registration Division (TS-767C)

APPLICANT: Rhone-Poulenc, Inc.
Agrochemical Division
P.O. Box 125
Monmouth Junction, NJ 08852

ACTIVE INGREDIENT:
Aluminum tris (o-ethylphosphonate) 80%
INERT INGREDIENTS: 20%

BACKGROUND:

Submitted an Eye Irritation study for review. Study conducted by Bio/dynamics, Inc. Data under EPA MRID No. 401311-01. Method of support not indicated. Label submitted stamped accepted November 13, 1986 with a CAUTION signal word.

RECOMMENDATION:

1. FHB/TSS finds this data acceptable to support conditional registration of this product.
2. In the Eye Irritation Study observations must be made for 21 days posttreatment or until all irritation subsides, whichever comes first.

3. The appropriate toxicity category is I - DANGER.
4. *Based on the eye study at least the signal word must be DANGER.*
Note to PM: There was no evidence as to whether the other 5 acute toxicity studies have been submitted and reviewed. It should be verified that these data have been reviewed, if not, then they need to be requested.

LABEL:

In regard to toxicity hazard according to the Eye Study the following precautionary statement "DANGER causes irreversible eye damage. If in eye flush with plenty of water and get immediate medical attention" must appear on the label.

REVIEW:

- (1) Eye Irritation Study: Bio/dynamics, Inc.; Project ID. 4090-82; September 13, 1982.

PROCEDURE:

Nine rabbits received 0.1 cc (40 mg) of the test material in one eye each. The eyes of three of the treated rabbits were washed with lukewarm water for one minute twenty seconds after treatment. Observations made for 14 days posttreatment.

RESULTS:

At 24 hours posttreatment, 6/6 rabbits of the unwashed group and 2/3 of the washed group had corneal opacity (6/6 = 20) (2/3 = 5); 5/6 + 3/3 iris irritation (5/6 = 5) (3/3 = 5); 6/6 + 3/3 conjunctive redness (6/6 = 2) (1/3 = 1, 2/3 = 2) and chemosis (1/6 = 1, 5/6 = 2) (3/3 = 1); 6/6 + 1/3 discharge (1/6 = 1, 3/6 = 2, 2/6 = 3); necrosis and ulceration also reported.

At day 7, 1/6 had corneal opacity (1/6 = 20); 4/6 + 1/3 redness (3/6 = 1, 1/6 = 2) (1/3 = 1); 2/6 chemosis (2/6 = 1); necrosis reported in 1/6.

At day 14, 3/6 + 1/3 redness (2/6 = 1, 1/6 = 2) (1/3 = 1); 2/6 chemosis (2/6 = 1).

STUDY CLASSIFICATION:

Core Minimum Data. See item #2 of Recommendation.

TOXICITY CATEGORY: I - DANGER