MEMORANDUM

Subject: Touchdown Concentrate Herbicide (Sulfosate; SC-0224) Identifying Numbers 10182-276 & 10182-277 Tox Chem No. 893C HED Project No. 0-1603

From: John H.S. Chen, D.V.M. Review Section I Toxicology Branch II Health Effects Division (H7509C)

To: Robert J. Taylor, PM 25 Herbicide-Fungicide Branch Registration Division (H7505C)

Thru: Yiannakis M. Ioannou, Ph.D., Section Head Review Section I Toxicology Branch II Health Effects Division (H7509C)

and

Marcia van Gemert, Ph.D., Branch Chief Toxicology Branch II Health Effects Division (H7509C)

Registrant: ICI Americas, Inc., Wilmington, Delaware

Action Requested: Review of Registrant's response to the previous Toxicology Branch review comments concerning the mouse micronucleus test with SC-0224 (Toxicology Branch MEMO 7/29/87 Bruce Jaeger).

Registrant's Response: "Attached is a summary table showing the results of the range-finding studies used to define the doses used in the micronucleus test. It is clear from the table that for males doses of 1400 mg/kg or higher resulted in 3 of 3 animal deaths by 48 hours. For females at least 2/3 of the animals died at 1000 ug/kg or higher. The table also shows a reduction
of PCE at 700 mg/kg in trial one and at 1200 mg/kg in trial two for males: 1000 mg/kg produced a reduction in PCE among females. These results justify the use of the reported doses 400, 600, 800 mg/kg for females - and 700, 900, 1100 mg/kg for males, and are consistent with the requirements of the Health Effects Guidelines."

Reviewer's Comments: The submitted addendum with table (attached) provided adequate information concerning the detailed range-finding test results for this study. The Registrant's response to the deficiency cited in the previous Toxicology Branch review of this study appears to be justified.

Recommendation: This study is upgraded to acceptable status. The test compound, SC-0224, did not induce any significant increase in the number of PCE containing micronuclei from the treated animals (400 through 1100 mg/kg) at all the time intervals evaluated.
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Pages ___ through ____ are not included in this copy.

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____ Identity of product inert impurities.
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____ Identity of the source of product ingredients.
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____ The product confidential statement of formula.
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