MEMORANDUM

SUBJECT: 10182-EUP-UR. Karate™ Application for Experimental Use Permit. No. 10182-EUP-UR.

TO: George LaRocca (PM Team #13) Registration Division (TS-767c)

FROM: Pamela M. Hurley, Toxicologist Section II, Toxicology Branch Hazard Evaluation Division (TS-769c)

THRU: Edwin R. Budd, Section Head Section II, Toxicology Branch Hazard Evaluation Division (TS-769c)

Record No. 160568

ICI Americas requested an Experimental Use Permit for Karate LEC for evaluation against destructive insects on a number of crops. In a memorandum to George LaRocca dated May 3, 1986, the Toxicology Branch had no objection to the issuance of the permit provided certain changes be made on the label for the formulation. One of the changes involved placing the word "DANGER" on the front panel and placing the word "POISON" with a skull and crossbones next to it on the label as well. These changes reflected a classification of the acute inhalation study on the 13% formulation as Toxicity Category I. The classification of the inhalation study was based on the old Toxicity Category chart which placed chemicals in Toxicity Category I when the LC50 was 0.2 mg/l or less for a 1-hour inhalation study. The new chart reflects the values for a 4-hour inhalation study, which is what is recommended in the EPA Guidelines. Therefore, the new value for classifying an acute inhalation study as Category I is an LC50 value of 0.05 mg/l or less. Thus, the Toxicity Category for the acute inhalation study on the 13% formulation of Karate is to be changed from Category I to II since the LC50's for the formulation in male and female rats fell between 0.05 and 0.5 mg/l (i.e. 0.315 and 0.175 mg/l respectively). The Toxicology Branch has no objection to removing the word "POISON" and the skull and crossbones from the label. However, the word "DANGER" should remain on the label because the dermal irritation study indicates that the substance is corrosive to the skin and is thus Toxicity Category I.