UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
ANDPOLLUTION PREVENTION

OFFICE OF PESTICIDE PROGRAMS
REGISTRATION DIVISION (7505P)

05/JUN/2014

MEMORANDUM

Subject: Acute Toxicity Review for EPA File Symbol 70506-GRN

Name of Pesticide Product:	Lifeline herbicide
EPA File Symbol:	70506-GRN
DP Barcode:	D419498
Decision No.:	487919
Action Code:	R310
PC Code:	128850 (glufosinate-ammonium)

From: Eugenia McAndrew, Biologist
Technical Review Branch
Registration Division (7505P)

E. McAndrew
M Hasler
Lead Toxicologist

To: Bethany Benbow, RM Team 23
Herbicide Branch
Registration Division (7505P)

Applicant: United Phosphorus, Inc.
630 Freedom Business Center, Suite 402
King of Prussia, PA 19406

FORMULATION FROM LABEL:

Active Ingredient(s):	% by wt.
Glufosinate-ammonium	24.5
Other Ingredient(s):	75.5
Total:	100.0%

ACTION REQUESTED: The Risk Manager requests a review of six acute toxicity studies submitted to support registration of the proposed product, EPA File Symbol 70506-GRN.

BACKGROUND: United Phosphorus, Inc. has submitted six acute toxicity studies (MRID Nos. 493200-09 to -14) to support the registration of the proposed product, Lifeline herbicide, EPA File Symbol 70506-GRN. The submission includes a basic CSF dated February 14, 2014 which must be reviewed and accepted by the TRB Product Chemistry Team.

GLP: Yes

DEVIATIONS: None

LABELING:

PRODUCT ID #: 070506-00310

PRODUCT NAME: Lifeline herbicide

PRECAUTIONARY STATEMENTS

SIGNAL WORD: CAUTION

Hazards to Humans and Domestic Animals:

Harmful if absorbed through skin. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Wear long-sleeved shirt and long pants, socks, shoes, and gloves. Remove and wash contaminated clothing before reuse.

First Aid:

If on skin:
-Take off contaminated clothing.
-Rinse skin immediately with plenty of water for 15-20 minutes.
-Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-xxx-xxxx for emergency medical treatment information.

User Safety Recommendations:

Users should:
-Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
-Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
-Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change clothing.

DATA EVALUATION RECORD

Product Reg. No.: 70506-GRN
Product Name: Lifeline herbicide

1. DP BARCODE: 419498				
2. PC CODE: 128850				
3. CURRENT DATE: June 5, 2014				
4. TEST MATERIAL: Glufosinate Ammonium 280 g/L SL (Glufosinate Ammonium 24.5% w/w Equivalent to 2.34 Pounds of Active Ingredient per U.S. Gallon) [Batch No. R&D/UPH 11-GF-331-101#91R/0413; Glufosinate Ammonium 24.91% w/w or 286.22 g/L; specific gravity 1.152; pH 6.60; clear liquid reddish in color free from visible suspended matter and sediment]				
Study/Species/Lab Study # /Date	**MRID**	**Results**	**Tox Cat**	**Core Grade**
Acute oral toxicity / rat Jai Research Foundation Dept. of Toxicology Study # 401-1-01-6810/August 17, 2013 OCSPP 870.1100; OECD 425	49320009	LD_{50} > 5000 mg/kg 5 females tested at 1750 mg/kg (1 animal), 3100 mg/kg (1 animal) or 5000 mg/kg (3 animals) All animals survived, no clinical signs, body weight gains, no gross abnormalities at necropsy Note: test substance was mixed with distilled water; slope of 4 was used in AOT 425 Statistical Program	IV	A
Acute dermal toxicity / rat Jai Research Foundation Dept. of Toxicology Study # 403-1-01-6811/August 10, 2013 OCSPP 870.1200; OECD 402	49320010	LD_{50} > 2000 mg/kg (both sexes) All animals survived, no clinical signs, body weight gains, no gross abnormalities at necropsy	III	A
Acute inhalation toxicity / rat Jai Research Foundation Dept. of Toxicology Study # 405-1-01-6812/August 9, 2013 OCSPP 870.1300; OECD 403	49320011	LC_{50} > 3.13 mg/L (both sexes) MMAD: 3.55 µm GSD: 2.92 All animals survived, no clinical signs, body weight gains after day 1, no gross abnormalities at necropsy	IV	A

Primary eye irritation / rabbit Jai Research Foundation Dept. of Toxicology Study # 407-1-01-6814/August 10, 2013 OCSPP 870.2400; OECD 405	49320012	3 females tested No corneal opacity or iritis; no positive scores; score of 1 for conjunctival redness in all eyes at 1 hr only; all eyes free of irritation at 24 hrs	IV	A
Primary dermal irritation / rabbit Jai Research Foundation Dept. of Toxicology Study # 406-1-01-6813/August 10, 2013 OCSPP 870.2500; OECD 404	49320013	3 males tested PDI = 0.08 Very slight erythema at 1 site at 1 hr only; no irritation at 24 hrs	IV	A
Dermal sensitization/guinea pig Jai Research Foundation Dept. of Toxicology Study # 408-1-01-6815/August 21, 2013 OCSPP 870.2600; OECD 406	49320014	*Not* a sensitizer Appropriate positive control provided	--	A

Core Grade Key: A =Acceptable, S = Supplementary, U = Unacceptable, D = Data Gap W= Waived