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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

OFFICE OF PESTICIDE PROGRAMS
REGISTRATION DIVISION (7505P)

May 30, 2013

MEMORANDUM:

Subject:	Name of Pesticide Product:	LG 99 Concentrate Herbicide
	EPA Reg. No. /File Symbol:	71995-LO
	DP Barcode:	408491
	Decision No.:	473754
	Action Code:	R310
	PC Code:	103601 (Glyphosate-isopropylammonium:41%)

From: Santa K Vinjamuri M.D., D.C.P., Biologist
Technical Review Branch
Registration Division (7505P)

Through: Technical Review Branch (TRB)
Registration Division (7505P)

To: Erik Kraft/Kable Davis RM 25
Herbicide Branch
Registration Division (7505P)

Registrant: Monsanto Company, Lawn & Garden products
600 13th Street, N.W., Suite 660
Washington, D.C. 20005

FORMULATION FROM LABEL:

Active Ingredient(s):		by wt.
Glyphosate, isopropylammonium salt		41.0%
Other Ingredient(s):		59.0%
	TOTAL	100.0%

Continued on the next page

ACTION REQUESTED: The Risk Manager requests TRB "Please review the cited mrids (see data matrix) and determine signal word/precautionary language."

BACKGROUND: Monsanto Company (herein the "registrant") in their letter dated Jan 4, 2013 stated that they are relying on the acute oral, dermal and inhalation toxicity, eye and dermal irritation and dermal sensitization studies (MRID's: 44057201- 07) that were previously submitted to the agency to support the registration of EPA Reg. No. 524-475 which will also support the registration of the current product LG 99 Concentrate Herbicide. These studies were reviewed in this memorandum.

COMMENTS AND RECOMMENDATIONS:

1. The six studies in MRIDs 44057202 through 44057207 have been reviewed and classified as acceptable. These studies satisfy the acute toxicity data requirements for the registration of EPA File Symbol 71995-LO.

2. Based on the acute toxicity profile as well as information from the Confidential Statement of Formula and the uses indicated on the proposed label, the following is the precautionary and first aid labeling for this 71995-LOas obtained from the TRB Label Review System:

3. The TRB Chemistry Team should review and accept the basic CSF dated January 4, 2013.

Precautionary Labeling:

PRODUCT ID #: **071995-00059**

PRODUCT NAME: **LG 99 CONCENTRATE HERBICIDE**

PRECAUTIONARY STATEMENTS

SIGNAL WORD: CAUTION

Hazards to Humans and Domestic Animals:

Causes moderate eye irritation. Avoid contact with eyes or clothing. Wear protective eyewear*. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using toilet. Wear long-sleeved shirt and long pants, socks and shoes.

*[Protective eyewear may be specified, if appropriate].

First Aid:

If in eyes:
-Hold eye open and rinse slowly and gently with water for 15-20 minutes.
-Remove contact lenses, if present, after the first 5 minutes, then continue rinsing.
-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.

Continued on the next page

DATA EVALUATION RECORD

Product Reg. No.: 71995-LO
Product Name: LG 99 Concentrate Herbicide

1. DP BARCODE: 408491				
2. PC CODES: 103601				
3. CURRENT DATE: May 30, 2013.				
4. Test material:				
Study/Species/Lab	**MRID**	**Results**	**Tox**	**Core**

Study # /Date			Cat	Grade
Acute oral toxicity / rat/ Huntingdon Life Sciences / Study No. 96-1430 / June 21, 1996 / Guideline number: OPPTS 870.1100; OECD 425	44057202	LD_{50} (males & females) = 5108 (5287 mg/kg for males and 5,000 mg/kg for females) Mortality: 0/10 at 2,500 & 3,500 mg/kg dose levels. 10/20 & 7/10 at 5,000 & 6,000 mg/kg dose levels respectively. Clinical signs included red staining of the snout, yellow ano-genital staining, excessive salivation, moist rales and watery stool and/or unformed stool. Additional signs seen during the next few days after dosing included black/brown stains on snout (3500 mg/kg animals only) and decreased food consumption and fecal volume. Some 5000 and 6000 mg/kg animals exhibited hypothermia, labored breathing & lethargy. Gross necropsy of decedents revealed red fluid in the thoracic cavity, red discoloration of thymic region & liver, thickened stomach walls with yellow or red contents. Gross necropsy of surviving animals revealed adhesions.	IV	A
Acute dermal toxicity / rat / Huntingdon Life Sciences / Study No. 96-1431/June 21, 1996 / OCSPP 870.1200; OECD 402	44057203	LD_{50} > 5000 mg/kg (both sexes) All animals survived, were free of significant clinical signs or severe dermal irritation. No abnormal findings were noted during necropsy.	IV	A
Acute inhalation toxicity / rat/ Ceregen a Unit of Monsanto Company Environmental Health Laboratory / Project No. EHL 96037/June 7 1996 Amendment June 27, 1996/ OCSPP 870.1300; OECD 403	44057204	LC_{50} combined sexes = 2.9 mg/L (2.7 mg/L for male & 3.1 mg/L for female rats) Mortality: 0/10 at 1.5 mg/L, 4/10 at 2.2 mg/L, 5/10 at 3.1 mg/L dose levels. MMAD = 2.1-2.5 µm, GSD = 1.9 - 2.2. Clinical signs during exposure included gasping labored respiration & gasping and rattling respiration sounds. During post-exposure clinical signs observed included nasal encrustation, urine-stained hair. Results of gross necropsy of decedents included corneal opacity, abnormal ocular discharge abnormal lung color, abnormal nasal/turbinate discharge or encrustation and discolored focus on the thymus. The only gross findings in some surviving animals included emaciation and	IV	A

		distended cecum, kidney & pelvis.		
Primary eye irritation / rabbit Huntingdon Life Sciences / Study No. 96-1399 / June 21, 1996/ OCSPP 870.2400; OECD 405	44057205	Moderately irritating to eyes. No corneal opacity. Moderate conjunctival irritation (redness, chemosis, discharge) in all treated eyes. All six animals were free of positive scores at 48 or 72 hours post-dose, and were free of all ocular irritation at 7 days post-dose. The EEC scores for corneal opacity and iritis - 0.0, conjunctival redness - 1.2 and for conjunctival swelling - 0.4.	III	A
Primary dermal irritation / rabbit Huntingdon Life Sciences / Study No. 96-1432 / March 22, 2012 OCSPP 870.2500; OECD 404	44057206	All animals had very slight (barely perceptible) and/or slight erythema, without edema. All animals were free of dermal irritation by 72 hours post-dose. Primary Irritation Index was 0.5. The EEC mean Erythema and edema scores were 0.3 and 0.0, respectively.	IV	A
Dermal sensitization / guinea pig (Buehler method) Huntingdon Life Sciences / Study No. 96-1433 / June 21, 1996 / OCSPP 870.2600; OECD 406	44057207	Negative (Not a sensitizer). Undiluted test material used for both induction and challenge. No dermal irritation was noticed either in the test group (after induction or after challenge) nor in the control group. Positive control study performed with Dinitrochlorobenzene(DNCB)validates the current study(conducted March 7, 1996).		A

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