



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

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

Ms. Helina Caravello
Senior Product Specialist, Microbiocides
Baker Performance Chemicals, Inc.
3920 Essex Lane
P.O. Box 27714
Houston, Texas 77227-7714

AUG 31 1989

Dear Ms. Caravello:

This is in response to your letter of October 3, 1988 in which you claimed that certain requirements in the Acrolein Comprehensive Data Call-In Notice of May 6, 1988, were inapplicable to the use patterns of your products Magnacide H Herbicide (10707-9) and Aqualin Herbicide (10707-15), used in the treatment of floating and submerged weeds in irrigation canals; Magnacide B Microbiocide (10707-10), and Shell Aqualin Biocide (10707-17) used in oil production in a closed-system treatment of bacteria in oilfield equipment; and Shell Magnacide S Slimicide (10707-16) used to treat microorganism-induced slime problems in pulp and paper mill systems. The Agency has reviewed your inapplicable data requests for seed germination seedling/emergence, and vegetative vigor (122-1), aquatic plant growth (122-2) and honey bee acute contact toxicity (141-1) studies and has reached the following conclusions.

Pulp and paper mill systems

On June 10, 1987, the Agency reviewed a monitoring study (Acces. #196656) of the dissipation rate of acrolein in treated irrigation water and determined that initial concentrations ranged from 0.77 to 1.5 ppm and were completely dissipated from the canals in approximately 35 hours on the average. Based on this information, the Agency will not require aquatic plant testing provided that the treated water is retained in the holding ponds for at least 48 hours. This restriction must be included on your label. Your draft proposed label must be sent to the Agency within 30 days of receipt of this letter. The honey bee acute toxicity testing is also considered to be inapplicable because the likelihood for exposure is minimal.

Oilfield equipment

The use of acrolein based products in this type of a system would not pose a threat to vegetation because the product is injected into the drilling equipment. The registrant indicated that the product will be injected back into the well and will remain underground to occupy the space evacuated by the oil. The label does not contain language to address the disposition of the product after it is separated from the usable oil products. Language should be developed to define the reinjection process as the endpoint for this use. If the label is changed to stipulate that the injection back into the reservoir is the ultimate endpoint, then the Agency agrees that this does not pose a problem to plants. If you decide to modify your label in order to avoid submitting the seed germination seedling/emergence and vegetative vigor and aquatic plant growth requirements, you must submit a draft proposed label within 30 days of receipt of this letter. If you have any questions regarding revision of your label, call Joanne Miller at (703) 557-1830.

Honey bee acute toxicity testing can also be considered to be inapplicable because the likelihood for exposure is minimal.

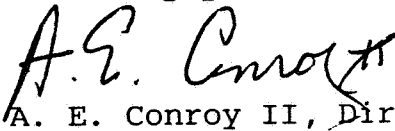
Irrigation canal systems

Baker Performance requested that the honey bee acute toxicity testing be considered to be inapplicable for irrigation canal systems. The Agency agrees because the likelihood for exposure of honey bees to this use is minimal therefore, these data are not required at this time.

Your failure to provide data/information as required in this letter may result in your receiving a Notice of Intent to Suspend for your products which contain acrolein.

If you have any questions regarding this letter, please call Betty Crompton of the Generic Chemical Support Branch at (703) 557-2558.

Sincerely yours,



A. E. Conroy II, Director

Office of Compliance Monitoring (EN-342)

Enclosure: Agency Review
cc: J. Miller