



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

List A File
6-23-94

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OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Propanil. List A Reregistration Case No./Chemical ID No. Meeting with Rohm and Haas and the Propanil Task Force Regarding the Retreatment Interval for Rice and the Holding Period for Water in Treated Paddies, 6/9/94. No MRID #. No CBRS #. No DP Barcode #.

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A meeting was requested by Rohm and Haas and the Propanil Task Force (PTF) to discuss the Agency's basis for requiring a 7-day retreatment interval for rice, and for requiring the holding period for water from treated paddies to be 30 days. The meeting was held 6/9/94, and was attended by the following:

Walt Waldrop (RB/SRRD)	Dr. Roger Novak, NPC Inc. (Rep. of the PTF)
Dr. Randolph Perfetti (CBRS/HED)	Dr. William T. Lynch, Rohm and Haas
Christina Swartz (CBRS/HED)	Dr. Robert H. Larkin, Rohm and Haas
	Jay A. Holmdal, Rohm and Haas

Background

The Propanil Task Force submitted data from several rice paddy studies to fulfill the requirements for aquatic field dissipation and irrigation/potable water data (1992); prior to submission of the study, a protocol was reviewed by the Agency (memo, H. Fonouni, 4/18/90; CBRS No. 6442). The review of the protocol stated that the rice should be treated twice aerially



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using the 4 lb/gal EC formulation, and that each application should be 4 lb ai/A. Furthermore, the label should specify a minimum interval between applications.

The submitted data were reviewed in the 9/2/92 memo of R. Perfetti (CBRS No. 9541; DP Barcode No. D175417). CBRS conclusions pertained only to irrigation/potable water data requirements. It was concluded that the data demonstrated that 3,4-dichloroaniline (3,4-DCA) and propanil residue levels (extractable and base-releasable) had declined to nondetectable levels (<0.01 ppm) in rice paddy and discharge water 60 days after the final propanil application. In addition, it was concluded that a retreatment interval of 14 days should be specified on registered labels. CBRS stated that provided the required label changes were made, then an MCL in water and tolerances in irrigated crops would not be required.

In response to these requirements, the Propanil Task Force submitted a letter which was discussed in the R. Perfetti review of 3/25/94 (CBRS No. 13332, DP Barcode No. D200196). The registrant stated that the required label amendments (60-day holding period; 14-day retreatment interval) were not compatible with rice agricultural practices, and proposed no retreatment interval and a 14-day holding period. CBRS reevaluated the data, and concluded that a retreatment interval of 7 days would be acceptable, and that a water discharge restriction of 30 days would be adequate. The 3/25/94 stated that these were the minimum intervals which could be accepted.

The registrant was advised that if these intervals were not acceptable, then additional data supporting the Task Force's proposals should be submitted. Without these data, the Agency would have to classify the application of propanil to rice as an aquatic use, and additional data would be required to set tolerances on irrigated crops.

In response the Propanil Task Force requested a meeting with Agency representatives to discuss the available data, and the basis for the required label amendments.

6/9/94 Meeting

The most important issue from the standpoint of the registrant and the PTF is the Agency's determination that a 30-day holding period is required for water in treated paddies. According to the registrant, a 30-day holding period is not compatible with rice culture. Among the arguments supporting the registrant's proposal to limit the holding period to 14 days were the following:

- Combined free DCA and propanil residues were less than the detection limit after 14 days.
- Surface water in rice culture areas is not used for potable water.

CBRS responded that although the free DCA and propanil residues were nondetectable, the enforcement method for propanil residues involves base release of bound DCA as well. Since

this is the method that would probably be used in any enforcement of water regulations, the base-releasable residues must be taken into account when determining the length of the holding period. Currently available data supports the 30-day period.

The registrant then proposed that bioavailability studies could be done for water; CBRS replied that in the past, the results of bioavailability studies have been equivocal at best. The registrant was also told that an acid/base experiment could not be used as surrogate study for bioavailability. The Agency does not believe that additional hydrolysis experiments would be fruitful. Dr. Perfetti then explained how the Office of Water (OW) sets MCLs, and what kind of data would be required; if the registrant opts for an MCL in water, the holding period may end up being even longer than 30 days.

The registrant proposed to submit literature references on this issue, and Dr. Perfetti advised them that they should also submit more information on rice culture along with the arguments for nonavailability. However, the registrant was advised that submission of this information will not guarantee that the Agency will allow a shorter holding period. Finally, the registrant was advised that the best hope for a favorable resolution of this issue (i.e. without submission of extensive residue data) would be if the Agency determines that only free DCA and propanil residues require regulation, and then the current enforcement method (employing base release of bound DCA residues) would not apply.

The second issue discussed was the 7-day retreatment interval. The registrant stated that there are cases in which a grower would need to re-apply immediately. For example, if there is significant rainfall immediately after application, the herbicide concentration may greatly decline, and weed pressure becomes severe within days. The registrant stated that retreatment in less than 7 days would occur approximately 5% of the time. Dr. Perfetti stated that three days is the minimum that retreatment would not be considered a 2X treatment. Since the available data support a 7-day retreatment interval, there must be a scientific reason for allowing retreatment within 3 days. The registrant was advised to submit in writing their argument for a 3-day interval.

The meeting concluded with a brief discussion of the status of various propanil residue studies.

If you need additional input, please advise.

cc: CSwartz; List A File; SF; RF; Circulation
7509C:CSwartz:CBRS:CM2:RM804F:703 305 5877:6/15/94
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