

Rereg. Std. 3-3-93



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

MAR 3 1993

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Response to the Propanil Reregistration Standard:
Residue Chemistry (No MRID #, CBRS #'s 11,291 and
11,275, Barcode Nos.: D187325 and D187530).

FROM: R. B. Perfetti, Ph.D., Chemist *R B Perfetti*
Reregistration Section 1
Chemistry Branch II: Reregistration Support
Health Effects Division (H7509C)

THRU: E. Zager, Chief *E Zager for*
Chemistry Branch II: Reregistration Support
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TO: Lois Rossi, Chief
Reregistration Branch
Special Review & Reregistration Division (H7508W)

and

E. Saito, Chief
Chemical Coordination Branch
Health Effects Division (H7509C)

The Propanil Task Force has responded to a CBRS review of propanil magnitude of the residue study in crayfish (CBRS No. 9876, R. Perfetti 9/14/92). No new data were included in this response. The following are our conclusions regarding their responses:

- 1) The Registrant has replied that they used the 4 lb a.i./acre treatment rate in the crayfish study because they estimate that ca. 95% of the usage of propanil on rice is at this application rate. The Registrant also responded that there were not enough crayfish available for harvest for analysis for residues of propanil. The Registrant also has stated that they never were informed of our review of their protocol in which CBRS indicated that the experiment should reflect an 8 lb a.i. /acre application rate (memo of 4/18/90, H. Founouni).



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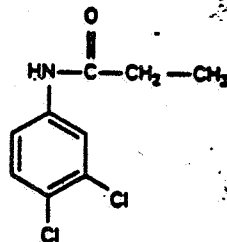
2) The Registrants also contends that repeating the studies at the correct rate would not provide any additional data because the crayfish burrow into the rice paddies in the rice season.

CBRS has considered the Registrants response and finds that a magnitude of the residue study reflecting an 0.5X application rate and harvest at one year versus 7 months is not acceptable information to determine an appropriate tolerance level for crayfish. The Registrant should be informed that a new study is needed.

Until the new experiment is submitted and reviewed the Registrant may wish to do the following;

Alter the label rate to allow a maximum of 4 lb a.i./acre and specify a one year PHI for commercial crayfish harvest. Or place a restriction on the label prohibiting application of propanil to rice paddies where commercial harvesting of crayfish is practiced.

The structure of propanil is:



If you need additional input please advise.

cc: RBP, Propanil Reregistration Standard File, Propanil Subject File, RF and Circ..