

Shaughnessy No.: 035201

Date Out of EAB: AUG 6 1987

TO: William Miller, PM #16
Insecticide-Rodenticide Branch
Registration Division (TS-767C)

FROM: Emil Regelman, Supervisory Chemist
Review Section #3
Exposure Assessment Branch
Hazard Evaluation Division (TS-769C)



Attached, please find the EAB review of:

Reg./File #: 352-456
Chemical Name: Dicrotophos
Type Product: Insecticide
Product Name: Bidrin®
Company Name: E.I. du Pont de Nemours & Company, Inc.
Purpose: Request for waiver of terrestrial field
dissipation data requirement.

ACTION CODE: 650 EAB #(s): 70234

Date Received: 1/30/87 Total Review Time: 2 days

Date Completed: 8/6/87

Monitoring study requested:

Monitoring study voluntarily:

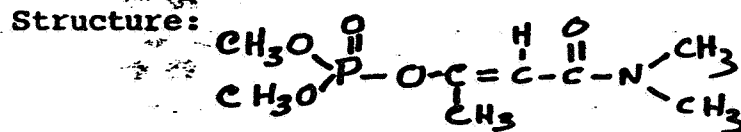
Deferrals to: Ecological Effects Branch
 Residue Chemistry Branch
 Toxicology Branch

1. CHEMICAL:

Common Name: Dicrotophos (BSI, ISO)

Chemical Name: 2-Dimethyl cis-2-dimethyl-carbamoyl-1-methylvinyl phosphate

Other Names: Bidrin, Carbicron, Ektafos, SD-3562



Physical/chemical properties:

Molecular weight:

Solubility: miscible in water, acetone.
very slightly soluble in kerosene.

Specific gravity: 1.2 @ 60/60 °F.

2. TEST MATERIAL: N/A.

3. STUDY/ACTION TYPE: Waiver request of terrestrial field dissipation study requirement (164-1).

4. STUDY IDENTIFICATION: N/A.

5. REVIEWED BY:

Padma R Datta, Ph.D.
Chemist
Review Section #3
EAB/HED/OPP

Signature: PR Datta

Date: 8/6/87

6. APPROVED BY:

Emil Regelman
Supervisory Chemist
Review Section #3
EAB/HED/OPP

Signature: ER

Date: AUG 6 1987

7. CONCLUSIONS:

EAB cannot concur with the waiver request of the terrestrial field dissipation study requirement (164-1) for the following reasons:

- a. EAB reviewed a field dissipation study conducted on a foreign soil (England), which does not support the data requirement (164-1) for dicrotophos.

7. **CONCLUSIONS: (Cont'd)**

- b. The soil site in England is not representative of domestic (cotton-growing area) soil.

8. **RECOMMENDATION:**

EAB recommends RD advise E.I. du Pont de Nemours & Company that two additional terrestrial field dissipation studies (164-1), as described in subdivision N of the Guidelines must be conducted in the cotton belt of the United States. These studies are required to support the continued registration for dicotophos under 40 CFR §158.130.

9. **BACKGROUND:**

On January 13, 1987, E.I. du Pont de Nemours and Company, Inc. requested a waiver of the terrestrial field dissipation (164-1) data requirement for dicotophos on the basis that the rate of degradation exceeded the criterion of 50% dissipation as specified in the Reregistration Guidance Document. The 50% dissipation is based on data previously submitted by Shell Oil Co. in May, 1984 (Acc# 263098).

This criterion applies only to considerations for waiver of a long-term soil dissipation study (164-5). When an active ingredient does not reach 50% dissipation in soil prior to a recommended subsequent application of the same active ingredient to the same sites utilized for the field dissipation studies (164-1, 164-2, 162-1) described in Subdivision N of the Guidelines, a long-term soil study (164-5) is required. However, if a 50% dissipation occur prior to a recommended subsequent application, the long-term dissipation study is not required and a request for waiver by the registrant is generally granted.

Subdivision N specifically recommends that (1) field dissipation studies should be conducted at two different sites representative of the pesticide use patterns. For restricted use patterns where only one typical area is involved, data from two similar sites is required; (2) the selected site should be domestic (native) soil of the United States and the location(s) should be where the product is intended to be used. In this case, (cotton use) the sites should be the cotton belt of the U.S.A.).

10. **DISCUSSION OF INDIVIDUAL TEST OR STUDIES:** N/A.
11. **COMPLETION OF ONE-LINER:** Not available. N/A
12. **CBI APPENDIX:** N/A.

REGISTRATION DIVISION DATA REVIEW RECORD

Confidential Business Information - Does Not Contain National Security Information (E.O. 12065)

159554-2
1-30-87

1. CHEMICAL NAME <i>Acetophenone</i>			
2. IDENTIFYING NUMBER <i>352-456</i>	3. ACTION CODE <i>650</i>	4. ACCESSION NUMBER <i>263098</i>	5. TO BE COMPLETED BY PM RECORD NUMBER <i>188254</i>
			6. REFERENCE NUMBER
			7. DATE RECEIVED (EPA) <i>1/20/87</i>
			8. STATUTORY DUE DATE
			9. PRODUCT MANAGER (PM) <i>Miller</i>
			10. PM TEAM NUMBER <i>No</i>

16. CHECK IF APPLICABLE		TO BE COMPLETED BY PCB	
<input type="checkbox"/> Public Health/Quarantine	<input type="checkbox"/> Minor Use	11. DATE SENT TO HED/TSS <i>1-30-87</i>	12. PRIORITY NUMBER <i>50</i>
<input type="checkbox"/> Substitute Chemical	<input type="checkbox"/> Part of IPM	13. PROJECTED RETURN DATE <i>3-27-87</i>	
<input type="checkbox"/> Seasonal Concern	<input type="checkbox"/> Review Requires Less Than 4 Hours		

15. INSTRUCTIONS TO REVIEWER		F. INSTRUCTIONS	
A. HED <input type="checkbox"/> Total Assessment - 3(c)(5)	C. <input type="checkbox"/> BFSD	<i>Registrant has referenced attached data in support of their data waiver request. Return to major mktg.</i>	
<input type="checkbox"/> Incremental Risk Assessment - 3(c)(7) and/or E.L. Johnson memo of May 12, 1977.	D. <input type="checkbox"/> TSS/RD		
B. SPRD (Send Copy of Form to SPRD PM)	E. <input type="checkbox"/> Other		
<input type="checkbox"/> Chemical Undergoing Active RPAR Review			
<input type="checkbox"/> Chemical Undergoing Active Registration Standards Review			

18. RELATED ACTIONS

17. 3(c)(1)(D)	18. REVIEWS SENT TO			
<input type="checkbox"/> Use Any or All Available Information	<input type="checkbox"/> TB	<input type="checkbox"/> EEB	<input type="checkbox"/> EF	<input type="checkbox"/> PL
<input type="checkbox"/> Use Only the Attached Data for Formulation and Any or All Available Information on the Technical or Manufacturing Chemical.	<input type="checkbox"/> RCB	<input checked="" type="checkbox"/> EFB	<input type="checkbox"/> CH	<input type="checkbox"/> BFSD

To	TYPE OF REVIEW	NUMBER OF ACTIONS							
		Registration	Petition	EUP	SLN	Sec. 18	Inert	MNR. USE	Other
HED	TOXICOLOGY								
	ECOLOGICAL EFFECTS								
	RESIDUE CHEMISTRY								
	X ENVIRONMENTAL DATA								<i>waiver request</i>
RD/TSS	CHEMISTRY								
	EFFICACY								
	PRECAUTIONARY LABELING								
BFSD	ECONOMIC ANALYSIS								

20. <input type="checkbox"/> Label Submitted with Application Attached	21. <input type="checkbox"/> Confidential Statement of Formula	22. <input type="checkbox"/> Representative Labels Showing Accepted Uses Attached	23. Date Returned to RD (to be completed by HED)	24. Include an Original and 4 (four) Copies of This Completed Form for Each Branch Checked for Review.
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