

11-6-92

MEMORANDUM

SUBJECT: Data review for PNMD  
 DP Barcode: 180899  
 ID No: 039002-001448

FROM: Douglas J. Urban, Acting Chief  
 Ecological Effects Branch  
 Environmental Fate and Effects Division (H7507C)

TO: Linda Deluise, PM 52  
 Reregistration Branch  
 Special Review/Reregistration Division (H7508W)

Buckman Labs submitted a bluegill sunfish and a rainbow trout acute toxicity study in support of the reregistration of Potassium N-methyldithiocarbamate (PNMDC). Both studies were performed with 54% active ingredient, the TGAI (personal communication with Carl I. Watson, the company agent, October 19, 1992). The LC<sub>50</sub>s were 108 ppm for bluegill sunfish and 62.2 ppm for coldwater fish. Guideline 72-1 has been satisfied.

*please note*

The bean sheet accompanying the studies also questioned if the studies could be used to support the reregistration of sodium methyldithiocarbamate (metam sodium). A metam sodium acute toxicity test with the bluegill sunfish (that did not fulfill guideline requirements because the actual concentrations that the bluegill sunfish were exposed to could not be ascertained) indicated that the chemical was very highly toxic to bluegill sunfish. The recently submitted PNMD study, however, characterized PNMD as practically nontoxic to warmwater fish. Because of the discrepancy in toxicity values for warmwater fish is approximately 200 fold, the warmwater fish toxicity testing for metam sodium may not be satisfied by PNMD testing. If a valid metam sodium study should confirm the large discrepancy in the toxicities of the potassium and sodium derivatives, a rainbow trout acute toxicity study will also be required with metam sodium. Avian testing may still be performed either with PNMD or metam sodium.

CONCURRENCES

SYMBOL	H7507C	H7507C	H-7507C				
SURNAME	H. Mansfield	Vaughan	[Signature]				
DATE	11/3/92	11.03.92	11/6/92				

EEB's testing requirements for aquatic nonfood industrial microbiocides has changed since the last data requirement summary for PNMDC. 7 tests are required for PNMDC's current use pattern (see copy of use sites from REFS, attached)--71-1 avian acute oral with bobwhite quail (preferred) or mallard duck; 71-2 avian dietary with bobwhite quail (preferred) or mallard duck; 72-1 acute fish with rainbow trout (preferred) or bluegill sunfish; 72-2 aquatic invertebrate acute toxicity with *Daphnia magna*; and 72-3, estuarine/marine acute toxicity testing with fish, shrimp, and oyster. Neither plant studies nor chronic studies will be required. A table reiterating the current status of the data requirements for PNMDC is attached.

If there are any questions, please contact Heather Mansfield (305-5064).