



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

AUG 26 1991
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OFFICE OF
PESTICIDES AND TOXIC
SUBSTANCES

MEMORANDUM

Subject: Naphthaleneacetic Acid and It's Salts, Esters, and Amides
Expedite Review Request for a Low Volume/Minor Use Waiver
by AMVAC Chemical Corporation and Chas H. Lilly, Company
for Data Requirements that were imposed in the 9/11/90
and 10/12/90 DCIs

From: Allan S. Abramson, Ph.D. *AS*
Acting Director
Special Review and Reregistration Division

To: Anne Barton, Director
Environmental Fate and Effects Division (H7507C)

In response to the 9/11/90 and 10/12/90 DCIs that were issued for Naphthaleneacetic Acid and It's Salts, Esters, and Amides, the registrant submitted a request for a low volume/minor use waiver for the following guideline requirements as part of their 90-day response:

Summary of Amvac's Low Volume Minor Use Waiver Response

(A comparison chart of how the Registrant responded to the guideline requirements for each salt is included in the letter from Amvac Chemical Corporation dated 6/12/91)

For Naphthalene Acetic Acid:

122-1(a)
122-1(b)
122-2
171-4(a)
171-4(b)
171-4(e)

For Naphthaleneacetic Acid- Potassium Salt

122-1(a)
122-1(b)
122-2
171-4(a)
171-4(b)
171-4(l) Apples, Olives, Oranges

Amvac's Response Con't

For Naphthaleneacetic Acid- Sodium Salt

83-1(a)
83-1(b)
83-2(a)
83-4
122-1(a)
122-1(b)
122-2
171-4(a)
171-4(b)
171-4(l) Apples

For Naphthaleneacetic Acid- Ammonium Salt

122-1(a)
122-1(b)
122-2
171-4(a)
171-4(b)
171-4(e)
171-4(k) Apples, Olives, Oranges, Pears, Tangerines
171-4(l) Apples, Olives, Oranges

For Naphthaleneacetamide

71-2(a)
85-1
122-1(a)
122-1(b)
122-2
171-4(a)
171-4(b)
171-4(l) Apples

For Naphthaleneacetic Acid- Ethyl Ester

71-2(a)
72-1(a)
72-2(a)
85-1
122-1(a)
122-1(b)
122-2
171-4(a)
171-4(b)

A Summary of Chas H. Lilly, Company's Low Volume Minor Use Waiver Response

(Chase H. Lilly Company has decided to take the responsibility for the generic data for NAA-Potassium Salt themselves, also, rather than pay compensation to Amvac Chemical Corporation for their data)

For Naphthaleneacetic Acid- Potassium Salt

- 82-2
- 83-1(a)
- 83-1(b)
- 83-2(a)
- 83-4
- 122-1(a)
- 122-1(b)
- 122-2
- 171-4(a)
- 171-4(b)
- 171-4(e)
- 171-4(k) Apples, Olives, Oranges, Pears, Tangerines
- 171-4(l) Apples, Olives, Oranges

Enclosed are Amvac's and Chas H. Lilly's 90-day response to the DCI requesting the low volume minor use waivers, a copy of the Data Requirements levied in the DCIs, and a copy of the Economic Analysis that were completed by the Biological and Economic Analysis Division. I am requesting an expedited review of these waiver requests since the registrants will need to initiate these studies soon to meet the designated due dates for these studies should the Agency deny these waivers. For this reason, I request that the review of these waivers be completed within three weeks upon receipt of this submission. Please let me know if you cannot complete your review by this date. I appreciate all of your help.