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SUBJECT: Meeting between Environmental Safety and Environmental Chemistry Section to discuss if chronic fish studies are needed on butralin, bux, CGA 24705, difolatan, hyamine 3500 and fluchloralin.

TO : Mr. James C. Touhey, Chief
Efficacy and Ecological Effects Branch

FROM : Mr. Ronald E. Key, Head
Environmental Chemistry Section, EEB
Mr. James W. Akerman, Head
Environmental Safety Section, EEEB

A meeting was held on June 17, 1975 between the Environmental Safety Section (ESS) and the Environmental Chemistry Section (ECS) to discuss hazards associated with the above mentioned pesticides. Once hazards are assessed the need for chronic fish studies supported with fish residue sampling can be determined.

The following criteria was used to assess positive hazards.

1. Persistence in soil.
2. Persistence in water.
3. Use (major) and use pattern.
4. Residues found in fish from fish accumulation study.

Results of the meeting and suggestions are listed below.

1. A chronic fish bioassay study supported with residue analyses will be required on CGA 24705 and fluchloralin. We will give registrant two years to obtain the data. We will inform C&ED that proper registration action was taken.

2. A chronic bioassay study is under way for butralin. We will inform registrant that we would like residue analyses to support the study. This should take place immediately. We will inform C&ED that proper registration action was taken.

3. We have received no response from C&ED on difolatan rice seed treatment. This was to be submitted to RD by June 1, 1975. Based on the use pattern we do not feel that difolatan is a candidate for chronic studies at this time. We should take immediate action to go along with registration. We will inform C&ED that proper registration action was taken.

4. Because there is a restriction on the label for Hyamine 3500 that treated water should not be discharged, we feel no action for further data requirements is needed at this time. No registration is involved at this time but we will inform CSLD that proper registration action will be taken for future uses of Hyamine 3500.

5. Bux is a chemical which falls in a grey area. We will go back and rereview all data and wait for CSLD to respond to our request.

This is the first and beginning of a way that EEE Branch can proceed to go ahead with registration and solve immediate data problems for which no criteria is established by setting interim criteria.

Ronald E. Hey, Jr.
Section Head
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cc:
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