

Shaughnessy No.: 079401

Date Out of EAB: MAR 11 1988

To: S. Lewis  
Product Manager 50  
Registration Division (TS-767C)

From: Frank Davido, Chief *Frank Davido*  
Field Studies and Special Projects Section #5  
Exposure Assessment Branch  
Hazard Evaluation Division (TS-769C)

THRU: Paul F. Schuda, Chief *Paul F. Schuda*  
Exposure Assessment Branch/HED (TS-769C)

Attached, please find the EAB review of...

Reg./File # : 179,975

Chemical Name: Endosulfan

Type Product : Insecticide Active Ingredient

Product Name : THIODAN® TECHNICAL

Company Name : American Hoechst Corporation

Purpose : Question on substitution of a subchronic inhalation study  
for the inhalation exposure study of § 133-4

Date Received: 10/2/1986

Action Code: 400

Date Completed: 3/11/88

EAB #(s) : 60870

Monitoring study requested:       

Total Reviewing Time: 1 day

Monitoring study voluntarily:       

Deferrals to:        Ecological Effects Branch  
       Residue Chemistry Branch  
       Toxicology Branch

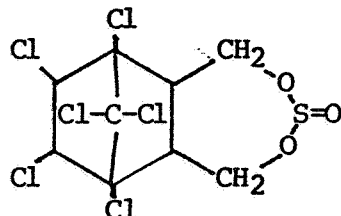
REVIEW OF REENTRY DATA

1. CHEMICAL:

Common name: ENDOSULFAN

Chemical name: 1,4,5,6,7,7-hexachloro-5-norbornene-2,3-dimethanol cyclic sulfite

Structure:



Other names: Thiodan, cyclodan, and many others CAS# 115-29-7, RTECS #RB9275000

2. TEST MATERIAL:

THIODAN® Technical

3. STUDY/ACTION TYPE:

Waiver Request [Request to substitute a chronic inhalation toxicity study for an inhalation exposure study].

4. STUDY IDENTIFICATION:

Studies entitled, "ENDOSULFAN REREGISTRATION NOVEMBER 1984 DATA REQUIREMENTS. THIODAN® TECHNICAL. EPA REGISTRATION NUMBER 8340-13. SECTION C (TOXICOLOGY)", and submitted by American Hoechst Corp. on January 9, 1985. Reg. File No., 079401; Accession Number, 256,114; Record No., 179,975; No MRID Number available.

5. REVIEWED BY:

James D. Adams, PhD  
Chemist

Field Studies and Special Projects Section #5

James D. Adams  
3/11/1988

6. APPROVED BY:

Frank Davido, Chief

Field Studies and Special Projects Section #5  
Exposure Assessment Branch, HED (TS-769)

Frank Davido  
3/11/1988

7. CONCLUSIONS:

The submitted toxicology data is not a substitute for inhalation exposure data, but it was not the intent of the registration standard to require that data. Inhalation exposure data does

not have to be submitted. It will be reviewed if the Registrant chooses to submit it.

8. RECOMMENDATIONS:

The Registrant should be informed that neither inhalation nor dermal exposure data is required. Their intended study of dissipation of dislodgeable foliar residues will suffice.

9. BACKGROUND:

The Endosulfan Registration Standard was issued in November 1984. In response to that Standard, the Registrant has submitted, a subchronic inhalation toxicity study that had previously been submitted to satisfy toxicology data requirements and asks if this data will fulfill the fieldworker inhalation exposure data requirement.

10. DISCUSSION OF INDIVIDUAL TESTS OR STUDIES:

The Registrant has previously submitted a protocol for conduct of a dislodgeable residue study. That protocol was reviewed in EAB #60831. The data to be provided by that study would suffice for estimation of fieldworker exposure. [See my review EAB # 60831 of 11/3/87.] That is, the dislodgeable residues can be used with surrogate exposure data [e.g. the exposure correlation of Pependorf and Leffingwell (1982)] to estimate fieldworker exposure at intervals after pesticide application. Neither inhalation nor dermal exposure data are necessary, but they may be submitted as additional support for the Registrant's proposed reentry interval or as an alternative to the dislodgeable foliar data.

11. COMPLETION OF ONE-LINER:

Not applicable.

12. CBI APPENDIX:

Not Applicable.