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Product Manager 15 La Rocca To: TS-767 Dr. Willa Garner From Chief, Review Section No. 1 Environmental Fate Branch Attached please find the environmental fate review of: Reg./File No.: 241-260 Chemical: Amdro Type Product: Insecticide Product Name: Amdro Company Name: American Cyanamid Submission Purpose: Waiver of batch equilibrium under new guidelines. Soil TLC & column studies have been completed. ACTION CODE: 571 ZBB Code: other EFB # _ 5 Date in: 10/6/81 TAIS (level II) Days Date Completed: OCT 8 1981 1 64 Deferrals To: Ecological Effects Branch Residue Chemistry Branch Toxicology Branch

Date Out: EFB: OCT 8 1981

1.0 INTRODUCTION

American Cyanamid has requested that EFB determine if the mobility studies previously submitted and reviewed satisfy the current guidelines requirements for the insecticide Amdro.

2.0 DISCUSSION

In an EFB review of 8/19/80, the study CL 217,000: Determination of Mobility in Soil, B.L. Reichert, Report PD-M, Volume 16-25, 2/1/79, American Cyanamid, Agricultural Research Division, Princeton, N.J., Accession No. 241-260 was found to be valid. In that study both soil TLC and soil column procedures were employed. Working under the 1978 guidelines, the reviewer also recommended that a batch equilibrium study (adsorption/desorption) was required.

The July 1981 guidelines state that either a soil TLC or soil column or a batch equilibrium study is required to satisfy mobility requirement for a terrestrial or forest use product. The batch equilibrium study would be required for a product intended for aquatic or aquatic impact uses.

3.0 RECOMMENDATION

Based on the data requirements of the July, 1981 guidelines and on the validity of already reviewed mobility studies, EFB recommends that the adsorption/desorption study not be required.

Richard V. Moraski,

Review Section No. 1 Environmental Fate Branch