Date Out of EFGWB: SEP | 4 1988 Richard Mountfort To: Product Manager #23 Fungicide-Herbicide Branch Registration Division (TS-767C) From: Emil Regelman, Supervisory Chemist Review Section #2 Environmental Fate & Ground Water Branch Environmental Fate & Effects Division (TS-769C) Thru: Paul F. Schuda, Ph.D., Chief Environmental Fate & Ground Water Branch Environmental Fate & Effects Division (TS-769C) Attached, please find the EFGWB review of... Reg./File # : 1471-RLI and 1471-RLO Common Name: Isoxaben Type Product : Herbicide Product Name: EL-107, Prolan, Flexidor Company Name: Elanco Products Company (Eli Lilly Research Laboratories) : Review additional information on fish accumulation (165-4) Purpose and leaching and adsorption/desorption studies (163-1). Action Code(s): 126, 126 Date Received: 6/3/88 EFGWB #(s): 80807, 80808 Date Completed: 9/12/88 Total Reviewing Time: 1 day Monitoring study requested: Monitoring study voluntarily: Ecological Effects Branch/EFED Deferrals to: Dietary Exposure Branch/HED

Toxicology Branch-HFA Support/HED

Shaughnessy No.: 125851

1. CHEMICAL: Common name:

Isoxaben

Chemical name:

N-[3-(methylpent-3-yl)isoxazol-5-yl]-2,6-dimethoxybenzamide

Other name(s):

EL-107, Prolan, Flexidor

Structure:

12.5 and 50% WP, 75% F1C

Physical/Chemical properties:

Molecular formula: C₁₈H₁₂N₂O₄

Physical state: White, crystalline solid

Melting point: 176-179°C Solubility in water: 1.0-2.0 ppm

2. TEST MATERIAL:

N/A.

3. STUDY/ACTION TYPE:

Review the additional information re quantitative identification of metabolites in fish and requirement of batch equilibrium study to assess ground water contamination.

4. STUDY IDENTIFICATION:

N/A.

5. REVIEWED BY:

P. Datta, Ph.D. Chemist Review Section #2 EFGWB/EFED/OPP Signature: PRDalla)

Date: 9/12/88

6. APPROVED BY:

Emil Regelman Supervisory Chemist Review Section #2, EFGWB/EFED/OPP Signature:_

Date: SEP | 4 1988

7. CONCLUSIONS:

EFGWB cannot accept the summary of the statement of clarification without laboratory TLC data on quantitation of the metabolites which were present in the origin material of the TLC plate data provided for isoxaben residues in fish tissues. Furthermore, residue data on whole fish were not submitted. Therefore, this fish accumulation study does not fulfill the data requirement for a fish accumulation study (§165-4).

The Ground Water Team of EFGWB does not require any additional study because the registrant satisfactorily completed the column leaching study to fulfill the data requirement for a leaching and adsorption/desorption study (§163-1). (See attached note from Patrick Holden of GWT/EFGWB).

8. RECOMMENDATION:

EFGWB recommends RD inform the registrant, Elanco Products Company: (1) to submit a new fish accumulation study (§165-4) providing a complete characterization of residues in whole, edible and non-edible tissues of fish measured experimentally, and (2) that the data requirement for a leaching and adsorption/desorption study (§163-1) is fulfilled.

9. BACKGROUND:

On 5/26/88, the registrant, Elanco Products Company, sent a letter to RD with clarification re the fish accumulation study (§165-4) and a rebuttal response to the Ground Water Team re the leaching and adsorption/desorption study (§163-1).

10. DISCUSSION OF INDIVIDUAL TESTS OR STUDIES:

N/A.

11. COMPLETION OF ONE-LINER:

See attached on one-liner sheet.

12. CBI APPENDIX:

N/A.