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To: Robert Forrest
 Product Manager 14
 Registration Division (7505C)

From: Anthony F. Maciorowski, Chief
 Ecological Effects Branch/EFED (7507C)

Attached, please find the EEB review of...

Reg./File # : 058035-I
 Chemical Name : Methyl Anthralinate
 Type Product : repellent
 Product Name : Rejex-It
 Company Name : PMC Specialties
 Purpose : Review info to upgrade studies.

Action Code: 146

Date Due: 11/2/94

Reviewer: Regina Hirsch

EEB Guideline/MRID Summary Table: The review in this package contains an evaluation of the following:

NO	D NO	N NO	D NO	N NO	NO	T
71-1 (A)		72-2 (A)		72-7 (A)		
71-1 (B)		72-2 (B)		72-7 (B)		
71-2 (A)		72-3 (A)		122-1 (A)		
71-2 (B)		72-3 (B)		122-1 (B)		
71-3		72-3 (C)		122-2		
71-4 (A)		72-3 (D)		123-1 (A)		
71-4 (B)		72-3 (E)		123-1 (B)		
71-5 (A)		72-3 (F)		123-2		
71-5 (B)		72-4 (A)		124-1		
72-1 (A)		72-4 (B)		124-2		
72-1 (B)		72-5		141-1		
72-1 (C)		72-6		141-2		
72-1 (D)				141-5		

Y=Acceptable (Study satisfied Guideline)/Concur

P=Partial (Study partially fulfilled Guideline but additional information is needed)

S=Supplemental (Study provided useful information but Guideline was not satisfied)

N=Unacceptable (Study was rejected)/Nonconcur



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

AUG 17 1994

MEMORANDUM

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

SUBJECT: Methyl Anthralinate Data Requirements

FROM: *AM* Anthony F. Maciorowski, Chief
Ecological Effects Branch
Environmental Fate and Effects Division (7507C) *Douglas J. ... 8/17/94*

TO: Robert Forrest, PM-14
Registration Division (7505C)

The registrant, PMC Specialties Group, has provided two reports (Analysis of Avian Dietary Study MRID 433041-01; Verification of Test Material MRID 433041-02) to allow upgrade of an avian dietary study and an aquatic invertebrate study. The information provided in the reports is sufficient to upgrade both of these studies to Core. With these studies now fully satisfied, a few remaining data gaps still exist, including:

- 71-4 Avian reproduction (Mallard)
- 154-8 Freshwater fish acute LC50 (Rainbow trout)
[Both TGAI and TEP required]
- 72-4 Fish early life stage
[Only for products allowing direct application to water]
- 154-11 Beneficial insect study (Honey bee).

These studies are needed to complete a full risk assessment for all proposed uses. Further clarifying points for the above requirements are as follows.

Avian reproduction - The pesticide may be applied up to 10 lbs. a.i./acre with repeat applications as necessary. This use can provide for chronic exposures



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and thus data on the chronic toxicity is needed. The mode of action claimed is as an avian repellent and if effective would prevent or reduce possible exposure. The avian dietary study with mallards demonstrated no reduction in food consumption or weight gain for diets treated with up to 5620 ppm. Data from an avian reproduction test are necessary unless waived by efficacy information which demonstrates effective repellency to eliminate possible chronic exposures to the pesticide.

Freshwater fish acute LC50 - The submitted studies under this topic were found to be supplemental and not upgradeable. These data indicate that methyl anthralinate is at least moderately toxic to fish. A core study with TGAI is needed to support all outdoor uses of this pesticide. A core study with TEP is needed to support any outdoor use which allows direct application to water. The TEP study can be waived for uses to standing water and impoundments if labeled against application to fish-bearing water.

Fish early life stage - This study was triggered by the toxicity and label provisions for direct application to water. The study can be waived for uses to standing water and impoundments if labeled against application to fish-bearing water.

Honey bee study - Uses to orchards and turf may provide for exposure to beneficial insects, such as the honey bee. Data are required to assess the risks to these beneficial insects from such uses. The following statement could be used as an interim measure if registration is permitted until relevant data are available. "Do not apply this product or allow it to drift to blooming crops or weeds if bees are visiting the treatment area."

Summary

Additional data are still required to allow completion of an ecological effects risk assessment. The fish acute toxicity study and the honey bee study are the only studies not subject to waiver by additional information or label restrictions. The high use rate associated with this product disqualifies this product from being considered as a low risk candidate for reduced data requirements.