



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

~~SECTION HEAD~~
Caswell file

APR 21 1987

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

Subject: RCB and EAB deferrals on Harmony (*CASWELL # 5735*)

To: Robert Taylor, PM# 25
Registration Division, TS-767C

From: Marcia van Gemert, Ph.D.
Head, Section III
Toxicology Branch, HED *M. van Gemert 4/20/87*

Thru: Theodore M. Farber, Ph.D.
Chief, Toxicology Branch, HED *WJF 4/20/87*

Both RCB and EAB have raised concerns about the triazine derivatives such as triazine amine of Harmony, and the acid form of the parent compound, DPX-M6316 free acid.

Residue Chemistry Branch has identified triazine derivatives (unspecified) at 0.024 ppm. These residues were identified in straw, but residues in grains have not yet been characterized. In straw, the triazine derivatives make up 13.6% of the total recoverable radioactivity, or 32% of the characterized residues. DPX-M6316 free acid was also identified, however, the memo gave no data concerning this compound.

Exposure Assessment Branch deferred to Toxicology Branch concerning the presence of DPX-M6316 acid and/or triazine amine in ground water. In rat metabolism studies very little degradation of parent compound occurred. EAB was concerned that if there is a potential toxicity concern for DPX M6316 free acid and triazine amine than field monitoring is warranted to determine the amount and extent of leaching in sandy soils. EAB stated that silt-loam soil field data indicate persistence and leaching of triazine amine. The latter degradable is stable to hydrolysis at pH 5, 7, and 9 for 30 days; therefore if residues leach to ground water, they could persist.

Toxicology Branch feels the data presented on the parent compound DPX-M6316 should be sufficient to cover the toxicology concerns for the acid form. However, Toxicology Branch has no data on the triazine amine. This compound appears to be very stable in the environment and has a potential for accumulation in ground water. Additionally, the potential for residues to be present in grains and straw add an additional concern.

Therefore Toxicology Branch is requesting that the firm provide

toxicity data on triazine amine. These studies should include an acute oral toxicity study, a mutagenicity battery, one teratology study, and one subchronic study in rats.

cc. H. Jacoby

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