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0190-D

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

NOV 5 1985

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Dicofol PD4 - Comments

FROM: Susan V. Hummel, Chemist
Special Registration Section II
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

Susan V. Hummel

THRU: Edward Zager, Section Head
Special Registration Section II
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

TO: Bruce Kapner, PM#70
Special Review Branch
Registration Division (TS-767)

RCB has been asked to comment on the proposed PD4 for dicofol. We concur on the document, provided the following changes are made.

p. 10, 3rd paragraph

More information is needed. Specify where the monitoring data were obtained. Does the statement, "...DDE residues in fish, currently about 0.4 ppm...", mean that the residues average about 0.4 ppm? Note that RCB recently analyzed FDA monitoring data from 1984 and found an average residue of 0.1 ppm DDE in fish. (See attached statistical analysis by Lisa Ratcliff, RCB.)

p. 12, bottom paragraph

A better wording would be:

> "...This concentration in water would result in DDTr residues of about 9 ppm in fish, a level..."

p. 45, bottom paragraph

Change the wording to:

> "Preliminary results from a poultry metabolism indicate that dicofol does not appear to metabolize to DDE in the chicken."

A number of typographical errors were noted. A list of these has been hand carried to Bruce Kapner.

Attachment (Statistical Analysis): attached to all copies

cc: R.F., circu, S. Hummel, dicofol S.F., dicofol S.R.F. (S. Hummel, SIS, E. Allen (PM15/IRB), PMSD/ISB
RDI:EZ:11/04/85:RDS:11/04/85
TS-769:RCB:SVH:svh:RM810:CM#2:11/05/85