

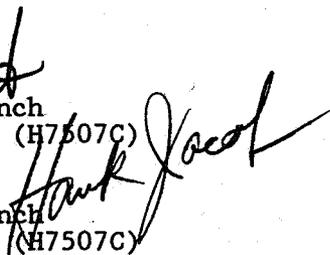
Shaughnessy Number: 028201

Date out of EFGWB: JUL 18 1991

To: Product Manager 71 (Waldrop/Stowe)
Reregistration Division

From: Akiya Abramovitch, Head
Environmental Fate Review Section #3
Environmental Fate and Ground Water Branch
Environmental Fate and Effects Division (H7507C)

Thru: Hank Jacoby, Chief
Environmental Fate and Ground Water Branch
Environmental Fate and Effects Division (H7507C)



Attached, please find the EFGWB review of...

Reg./File #: n.a.

Chemical Name: Propanil

Type Product: herbicide

Product Name: n.a.

Company Name: Rohm and Haas

Purpose: request for status report on data requirements; re evaluation of waiver requests

Date Received: 06/04/91

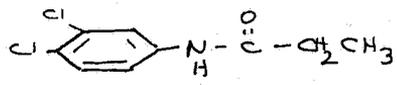
Action Code: 614

EFGWB#(s): 91-0667

Total Reviewing Time (decimal days): 0.5 days

- Deferrals to:
- Ecological Effects Branch, EFED
 - Science Integration and Policy Staff, EFED
 - Non-Dietary Exposure Branch, HED
 - Dietary Exposure Branch, HED
 - Toxicology Branch

1. CHEMICAL:

chemical name: 3,4-dichloropropionanilide, N-(3,4-dichlorophenyl) propanamide
common name: propanil
trade name: n.a.
structure: 
CAS #: 709-98-8
Shaughnessy #: 28201

Propanil

2. TEST MATERIAL:

3. STUDY/ACTION TYPE: request for status report on data requirements; reevaluation of waiver requests

4. STUDY IDENTIFICATION: n.a.

5. REVIEWED BY:

Typed Name: E. Brinson Conerly-Perks
Title: Chemist, Review Section 3
Organization: EFGWB/EFED/OPP

E. B. Conerly-Perks 7/16/91

6. APPROVED BY:

Typed Name: Akiva Abramovitch
Title: Head, Review Section 3
Organization: EFGWB/EFED/OPP

Akiva Abramovitch

7. CONCLUSIONS:

The waiver requests seem unnecessary. With two exceptions, all the data still required by EFGWB to support terrestrial food uses ^{is} also applicable to aquatic uses. The data to support aquatic uses, i.e. rice, will be submitted by the Propanil Task Force. The applicant, Rohm and Haas, is a member of this group, and the data will cover its products. Rohm and Haas will have to submit only two items in support of the terrestrial use:

- 1) a study on photolysis on soil. EFGWB cannot recommend that this study be waived, but it is not an especially difficult or expensive one.
- 2) additional information on an already reviewed study on aerobic metabolism in soil. The information still needed includes metabolism on loamy clay soil and details of the minor metabolic pathway which was mentioned, but not described fully. The submitted study is currently classified as supplemental.

8. RECOMMENDATIONS:

EFGWB cannot recommend any waivers of data at this time, since almost all of the remaining EFGWB requirements are already being supplied, and will cover this applicant. The two exceptions, photolysis on soil, and additional information on aerobic soil metabolism, will require relatively little effort to develop.

9. BACKGROUND:

In February 1989, the applicant requested waivers of data required strictly to support terrestrial uses, on the basis that these uses were minor, due to the very limited area in which they are applied. These waiver requests were denied when originally reviewed (letter from A.E. Conroy, July 1989).

The several studies required to support registration on terrestrial crops include the following:

hydrolysis -- pending, will be submitted by the Propanil Task Force

photodegradation in water -- pending, will be submitted by the Propanil Task Force

photodegradation on soil -- not fulfilled

aerobic soil metabolism -- partially fulfilled, supplemental information provided by MRID 415387-01, reviewed EBC 12/3/90

anaerobic soil metabolism -- can be fulfilled by the anaerobic aquatic metabolism study which is to be submitted by the Propanil Task Force

leaching/adsorption/desorption -- pending, will be submitted by the Propanil Task Force

field soil dissipation -- pending, will be submitted by the Propanil Task Force

long term field dissipation -- conditionally required, if the short term study indicates the need

accumulation in confined rotational crops -- pending, will be submitted by the Propanil Task Force

accumulation in field rotational crops -- conditionally required, if the confined study indicates uptake of residues of concern

fish bioaccumulation -- waiver recommended due to low k_{ow} and applicant's affirmation of low accumulation in fathead minnows

Data requirements for aquatic food use and their status is as follows:

hydrolysis -- pending, also required for terrestrial crop use; will be submitted by the Propanil Task Force

photolysis in water -- pending, will be submitted by the Propanil Task Force

anaerobic aquatic metabolism -- pending, will be submitted by the Propanil Task Force

aerobic aquatic metabolism -- pending, will be submitted by the Propanil Task Force

leaching/adsorption/desorption -- pending, also required for terrestrial crop use as noted above; will be submitted by the Propanil Task Force

aquatic field dissipation -- pending, will be submitted by the Propanil Task Force

long term field dissipation -- conditionally required

confined accumulation on rotational crops -- pending, will be submitted by the Propanil Task Force

field accumulation on rotational crops -- requirement reserved pending results of confined study, also required for terrestrial uses, as noted above

confined accumulation on irrigated rotational crops -- pending

fish bioaccumulation -- waiver recommended due to low k_{ow} and applicant's affirmation of low accumulation in fathead minnows

Because of informal reports that propanil applied to rice subsequently reached and damaged non-target crops, especially prune trees, EFGWB also requires the following studies, which are not usually imposed for aquatic uses:

lab volatility -- the Propanil Task Force has not specifically addressed this issue

spray drift -- EFGWB believes some studies have already been done.
If this is the case, they should be submitted and evaluated before
additional work is initiated

downwind monitoring of deposition on other crops -- for this special
study, a protocol must be submitted and approved in advance. It
should be designed to identify formulation type(s), if any, which
inhibit or enhance migration of propanil from the target crop.

According to the 1987 Registration standard, 95% of the manufactured product is
used on rice. The Propanil Task Force does not intend to support the terrestrial
food uses (i.e. the 5% which is not rice) which include the uses discussed in
this submission.

10. DISCUSSION OF INDIVIDUAL TESTS OR STUDIES: See individual DER
11. COMPLETION OF ONE-LINER: no information added
12. CBI APPENDIX: none