

029001

Date Out EAB:

1/13/87

To: Werdig
Product Manager 50
Registration Division (TS-767)

From: Herbert Manning Ph.D., Acting Chief *HJM*
Environmental Chemistry Review Section 1
Exposure Assessment Branch
Hazard Evaluation Division (TS-769)

Attached please find the environmental fate review of:

Reg./File No.: _____

Chemical: 1,3-Dichloropropene

Type Product: Insecticide

Product Name: 1,3-D

Company Name: DOW

Submission Purpose: Ground Water Data Call In

ACTION CODE: 495

Date In: 10/21/86

EAB # 70031

Date Completed: _____

TAIS (level II) Days

1.00

Deferrals To:

_____ Ecological Effects Branch

_____ Residue Chemistry Branch

_____ Toxicology Branch

Monitoring study requested by EAB: ☐

Monitoring study voluntarily conducted by registrant: ☐

REGISTRATION DIVISION DATA REVIEW RECORD

Confidential Business Information - Does Not Contain National Security Information (E.O. 12065)

10/22/86

19147 HED

1. CHEMICAL NAME

1,3-Dichlorobenzene

2. IDENTIFYING NUMBER	3. ACTION CODE	4. ACCESSION NUMBER	TO BE COMPLETED BY PM
029001	495	n7a	5. RECORD NUMBER 183,148
			6. REFERENCE NUMBER
			7. DATE RECEIVED (EPA) 10/11/86
			8. STATUTORY DUE DATE
			9. PRODUCT MANAGER (PM) C. Werdig/S. Lewis
			10. PM TEAM NUMBER 50

14. CHECK IF APPLICABLE

- ☐ Public Health/Quarantine

☐ Substitute Chemical

☐ Seasonal Concern

☐ Minor Use

☐ Part of IPM

☐ Review Requires Less Than 4 Hours

AF

TO BE COMPLETED BY PCB

11. DATE SENT TO HED/TSS
10-21-86

12. PRIORITY NUMBER
20

13. PROJECTED RETURN DATE
1-2-87

15. INSTRUCTIONS TO REVIEWER

- A. HED ☐ Total Assessment - 3(c)(5)
☐ Incremental Risk Assessment - 3(c)(7) and/or E.L. Johnson memo of May 12, 1977.
- B. SPRD (Send Copy of Form to SPRD PM)
☐ Chemical Undergoing Active RPAR Review
☐ Chemical Undergoing Active Registration Standards Review

- C. ☐ BFS
D. ☐ TSS/RD
E. ☐ Other

F. INSTRUCTIONS

Please address Day's October 7, 1986 letter regarding photolysis in air study and field dissipation study and anaerobic aquatic studies.

16. RELATED ACTIONS

Record #172,648

17. 3(c)(1)(D)

- ☐ Use Any or All Available Information ☐ Use Only Attached Data
☐ Use Only the Attached Data for Formulation and Any or All
☐ Available Information on the Technical or Manufacturing Chemical.

18. REVIEWS SENT TO

- ☐ TB ☐ EEB ☐ EF ☐ PL
☐ RCB ☐ EFB ☐ CH ☐ BFS

19. To	TYPE OF REVIEW	NUMBER OF ACTIONS							
		Registration	Petition	EUP	SLN	Sec. 18	Inert	MNR. USE	Other
HED	TOXICOLOGY								
	ECOLOGICAL EFFECTS								
	RESIDUE CHEMISTRY								
	X ENVIRONMENTAL DATA San Diego								
RD/TSS	CHEMISTRY								
	EFFICACY								
	PRECAUTIONARY LABELING								
BFS	ECONOMIC ANALYSIS								

20. ☐ Label Submitted with Application Attached

21. ☐ Confidential Statement of Formula

22. ☐ Representative Labels Showing Accepted Uses Attached

23. Date Returned to RD (to be completed by HED)

24. Include an Original and 4 (four) Copies of This Completed Form for Each Branch Checked for Review.

INTRODUCTION:

DOW has requested waivers from three studies requested under the ground-water-data-call-in (gwdc). This review addresses these waiver requests. Specifically, DOW has asked for a waiver from the Photodegradation in Air study (161-4), Anaerobic Aquatic study (162-3), and the Field Dissipation study (164-1). The waiver requests were discussed as Points 1, 2, and 3, respectively.

DISCUSSION/CONCLUSION:

As per our meeting on December 11, 1986 with DOW, Points 2 and 3 in the October 1, 1986 letter from Jim Ackerman to Frances O'Melia were resolved.

Specifically, Point 2 regarding the need for an anaerobic aquatic study (162-3) for Telone II's active ingredient 1,3-D was discussed. It was agreed that the requirement for the study would be waived, if DOW would remove the rice use from the Telone II label. Telone II use on rice is considered minimal. DOW has agreed to remove this use from its label.

Point 3 addresses the need for a field dissipation study (164-1) for Telone II's active ingredient 1,3-D. Currently, DOW is performing two field dissipation studies, one in California, one in Florida. The study from California has been concluded and submitted, but not yet reviewed by EAB. Because EAB did not have a chance to review the study protocols for these prospective field studies, the studies may or may not be adequate to define the extent of leaching of 1,3-D, 1,2-D, and chloro-allyl alcohol (the 2 major compounds + degradate + impurities in the product of concern to the Agency). No new studies are required until EAB can review the currently in-progress studies.

Some ground-water monitoring in areas representative of both past and present use may be necessary. The Agency has asked DOW to comply with a large scale retrospective ground-water monitoring study focusing on 1,3-D, 1,2-D, and chloro-allyl alcohol, and impurities in the Telone II product in areas of past and present use.

Pending receipt of these two prospective field studies for Telone II, EAB may recommend further prospective ground-water studies with a greater emphasis on ground-water monitoring. Any decisions remain dependent upon completion of already submitted data and incoming data.

Point 1 addresses the need for a Photodegradation in Air study (161-4). This study is not a necessary part of the gwdc. It is not required by the gwdc. However for the Registration Standard and for the Special Review concerns, the study may be required. This decision cannot be made by EAB. We defer to the Toxicology Branch or the Special Review Branch (Bruce Kappner). DOW cites and argues from data that EAB's gwdc reviewer is unfamiliar with. Please forward a copy of this review to SRB or Tox Branch.

Catherine Eiden
GWDCI/EAB

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