

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



OFFICE OF PESTICIDES AND TOXIC SUBSTANCES

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1-12-83 MEMORANDUM

TO:

Richard Mountfort, PM #23

Registration Division (TS-767)

THRU:

Bruce Jaeger, Section Head

Review Section #1

Toxicology Branch/HED (TS-769)

SUBJECT:

Caswell No. 315. Dimethylamine salt of 2,4-D and Butoxyethanol ester of 2,4-D in water.

Re: 11683-EUP-2 and 11683-EUP-3 (expired 12/28/82)

with OG 2301 and OH 5252.

Background:

EUP's using both the salt and ester of 2,4-D were previously reviewed by Toxicology Branch. At that time a concern was stated over the possible degradation of these compounds to the dichlorophenol and/or dimethyl nitrosamine in the water environment. The EUP requestors, Bur. of Reclamation and the Corps of Engineers, added those parameters to their testing program. Data from those EUP's were submitted.

Comments:

- 1. Toxicology Branch can not comment on the values obtained for the following reasons: a. methodology review for the analysis in water is the preview of RCB., b. values submitted do not appear to be appropriate (Table 16, Table 17)
- 2. Toxicology Branch questions whether the DMA of 2.4-D was contaminated prior to use.
- 3. Toxiocology Branch cannot provide a hazard evaluation requested on the use without RCB's review and input of the submitted data.

Henry Spencer, Ph.D. ful 1/10/83
Review Section #1
Toxicology Branch/HED (154769)

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