

DP Barcode : D191172
 PC Code No : 031401
 EEB Out : JUL 14 1993

To: WALTER WALDROP
 Product Manager 71
 Special Review and Reregistration Division (H7508W)

From: Anthony F. Maciorowski, Chief
 Ecological Effects Branch/EFED (H7507C)

Attached, please find the EEB review of...

Reg./File # : REREG CASE NO: 0294 LIST A
 Chemical Name : 2,4-DP (DICHLORPROP)
 Type Product :
 Product Name :
 Company Name : TASK FORCE
 Purpose : REVIEW ECOLOGICAL EFFECTS TESTING PLAN. TASK
 FORCE HAS ALREADY BEGUN TESTING WITH DMA AND EHE, AND HAS
 NOT PLANNED TO DO TESTING WITH ACID. PLEASE COMMENT
 Action Code : 635 Date Due : 8-9-93
 Reviewer : RIEDER Date In EEB: 5-12-93

EEB Guideline/MRID Summary Table: The review in this package contains an evaluation of the following:

GDLN NO	MRID NO	CAT	GDLN NO	MRID NO	CAT	GDLN NO	MRID NO	CAT
71-1(A)			72-2(A)			72-7(A)		
71-1(B)			72-2(B)			72-7(B)		
71-2(A)			72-3(A)			122-1(A)		
71-2(B)			72-3(B)			122-1(B)		
71-3			72-3(C)			122-2		
71-4(A)			72-3(D)			123-1(A)		
71-4(B)			72-3(E)			123-1(B)		
71-5(A)			72-3(F)			123-2		
71-5(B)			72-4(A)			124-1		
72-1(A)			72-4(B)			124-2		
72-1(B)			72-5			141-1		
72-1(C)			72-6			141-2		
72-1(D)						141-5		

Y=Acceptable (Study satisfied Guideline)/Concur

P=Partial (Study partially fulfilled Guideline but
 additional information is needed)

S=Supplemental (Study provided useful information but Guideline was
 not satisfied)

N=Unacceptable (Study was rejected)/Nonconcur



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

JUL 14 1993

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Identification of Additional Testing with Dichlorprop
(2,4DP) D191172

FROM: Anthony F. Maciorowski, Chief
Ecological Effects Branch
Environmental Fate and Effects Division H7507C

TO: Walter Waldrop, PM 71
Reregistration Branch
Special Review and Reregistration Division H7508W

The EEB is responding to a second request from SRRD to identify the specific testing needed to fulfill the ecological data requirements for the D-form (optically pure form) of 2,4DP. The previous memorandum (1-21-93) indicated that basic testing was required on the acid form, with bridging data with to the DMA and EHE forms.

In the meantime, the task force supporting the registration of 2,4DP had begun selective testing the DMA and EHE forms, and indicate they were not planning to test the acid.

RECOMMENDATIONS

The test scheme that would yield data in which greatest confidence could be placed would be to test the acid, and each form (DMA and EHE). However, the EEB previously agreed that if all tests were conducted with the acid, and certain bridging data conducted with the DMA and EHE, a risk assessment could be conducted with reasonable certainty. That is still our first preference if a complete database is not provided with all forms.

However, as an alternative, and to yield information that could still be used to assess risk, the task force may conduct each of the basic required tests with both the DMA and the EHE. Then, the bridging tests (71-1 avian acute oral, 72-1 fish acute (either species), and 123-1b vegetative vigor) could be conducted with the acid. However, this would yield a risk assessment with slightly lower relative certainty.

We recommend that the task force conduct the following tests with the identified test materials:



Recycled/Recyclable
Printed with Soy Canola Ink on paper that
contains at least 50% recycled fiber

<u>Test #</u>	<u>Test Type</u>	<u>2,4DP acid</u>	<u>2,4DP DMA</u>	<u>2,4DP EHE</u>
71-1	avian LD50	yes*	yes	yes*
71-2a	avian LC50 quail	no	yes	yes
71-2b	avian LC50 mallard	no	yes	yes
72-1a	fish LC50 warmwater	\either	yes	yes
72-1c	fish LC50 coldwater	/ one*	yes	yes
72-2a	invertebrate LC50	no	yes*	yes
123-1a	terr plant SG/SE	no	yes	yes
123-1b	terr plant VV	yes*	yes	yes
123-2	aquatic plant	no	yes	yes
141-1	bee acute	no	yes	yes

*denotes studies EEB requests that are not planned by task force.

DISCUSSION

If the data promised/conducted by the task force is submitted, and the additional data are not provided (denoted by asterisks), the EEB will assess risk with the condition that moderate relative certainty be assigned to the conclusions. Results from the additional 5 tests, if available, would yield a risk assessment with higher relative certainty and is preferable. Especially important is the avian acute oral LD50. The value of information added for obtaining the avian LD50 with all three forms is high; it should be required.

If you have questions, please contact Dan Rieder (305-5314) or Rick Petri (305-7358).