

16 FEB 1988

MEMORANDUM

SUBJECT: Registration Standard for 2,4-DP -  
Nontarget Insect Studies

FROM: Allen W. Vaughan, Entomologist  
Ecological Effects Branch  
Hazard Evaluation Division (TS-769-C)

THRU: Otto Gutenson, Acting Head - Section 4  
Ecological Effects Branch  
Hazard Evaluation Division (TS-769-C)

THRU: Henry T. Craven, Acting Chief  
Ecological Effects Branch  
Hazard Evaluation Division (TS-769-C)

TO: Christine Rice, FMT-23  
Herbicide/Fungicide Branch  
Registration Division (TS-767-C)

The Ecological Effects Branch has determined that no data are available on 2,4-DP herbicides and honey bees. See data are required for each of the four herbicides included under this standard, as they all have registered uses which may result in bee exposure. The data requirements are indicated in the four attached data tables.

**Attachments**

cc: B. Lowery (SPSM/HED)  
H. Jacoby (SIPS/HED)

## 2,4-DP Registration Standard - Nontarget Insects

Attached data tables reflect the status of data requirements for the 2,4-DP herbicides: dimethylamine salt, triethanolamine salt, 2-butoxyethanol ester, and isooctyl ester.

TABLE A  
GENERIC DATA REQUIREMENTS FOR 2,4-DP, DIMETHYLAMINE SALT

Data Requirement	Composition	Use Pattern	Does EPA Have Data To Satisfy This Requirement? (Yes, No, or Partially).	Bibliographic Citation	Must Additional Data Be Submitted Under FIFRA Section 3(c)(2)(B)?
§158.155 Nontarget Insect					
<u>NONTARGET INSECT TESTING - POLLINATORS:</u>					
141-1 - Honey bee acute contact LD50	TGAI	B	NO		YES
141-2 - Honey bee - Toxicity of residues on foliage	TEP	B	NO		NO <sup>1/</sup>
141-4 - Honey bee subacute feeding study	[Reserved] <sup>2/</sup>				
141-5 - Field testing for pollinators	TEP	B	NO		NO <sup>1/</sup>
<u>NONTARGET INSECT TESTING - AQUATIC INSECTS</u>					
142-1 - Acute toxicity to aquatic insects	[Reserved] <sup>3/</sup>				
142-2 - Aquatic insect life-cycle study	[Reserved] <sup>3/</sup>				
142-3 - Simulated or actual field testing for aquatic insects	[Reserved] <sup>3/</sup>				
143-1 <u>NONTARGET INSECT</u> thru <u>TESTING-PREDATORS</u> 143-3 <u>AND PARASITES</u>	[Reserved] <sup>3/</sup>				

Composition: TGAI = Technical grade of the active ingredient; TEP = Typical end-use product. The use patterns are coded as follows: A = Terrestrial, Food Crop; B = Terrestrial, Non-Food; C = Aquatic, Food Crop; D = Aquatic, Non-Food; E = Greenhouse, Food Crop; F = Greenhouse, Non-Food; G = Forestry; H = Domestic Outdoor; I = Indoor.

- 1/ Requirement deferred pending evaluation of data from the acute contact test
- 2/ Reserved pending development of test methodology.
- 3/ Reserved pending Agency decision as to whether the data requirement should be established.

TABLE A  
GENERIC DATA REQUIREMENTS FOR 2,4-DP, TRIETHANOLAMINE SALT

Data Requirement	Composition	Use Pattern	Does EPA Have Data To Satisfy This Requirement? (Yes, No, or Partially).	Bibliographic Citation	Must Additional Data Be Submitted Under FIFRA Section 3(c)(2)(B)?
§158.155 Nontarget Insect					
<u>NONTARGET INSECT TESTING - POLLINATORS:</u>					
141-1 - Honey bee acute contact LD50	TGAI	B	NO		YES
141-2 - Honey bee - Toxicity of residues on foliage	TEP	B	NO		NO <sup>1</sup>
141-4 - Honey bee subacute feeding study	[Reserved] <sup>2/</sup>				
141-5 - Field testing for pollinators	TEP	B	NO		NO <sup>1</sup>
<u>NONTARGET INSECT TESTING - AQUATIC INSECTS</u>					
142-1 - Acute toxicity to aquatic insects	[Reserved] <sup>3/</sup>				
142-2 - Aquatic insect life-cycle study	[Reserved] <sup>3/</sup>				
142-3 - Simulated or actual field testing for aquatic insects	[Reserved] <sup>3/</sup>				
143-1 <u>NONTARGET INSECT</u> thru <u>TESTING-PREDATORS</u> 143-3 <u>AND PARASITES</u>	[Reserved] <sup>3/</sup>				

Composition: TGAI = Technical grade of the active ingredient; TEP = Typical end-use product.

The use patterns are coded as follows: A = Terrestrial, Food Crop; B = Terrestrial, Non-Food; C = Aquatic, Food Crop; D = Aquatic, Non-Food; E = Greenhouse, Food Crop; F = Greenhouse, Non-Food; G = Forestry; H = Domestic Outdoor; I = Indoor.

- 1/ Requirement deferred pending evaluation of data from the acute contact test.
- 2/ Reserved pending development of test methodology.
- 3/ Reserved pending Agency decision as to whether the data requirement should be established.

TABLE A  
GENERIC DATA REQUIREMENTS FOR 2,4-DP, 2-BUTOXYETHYL ESTER

Data Requirement	Composition	Use Pattern	Does EPA Have Data To Satisfy This Requirement? (Yes, No, or Partially).	Bibliographic Citation	Must Additional Data Be Submitted Under FIFRA Section 3(c)(2)(B)?
§158.155 Nontarget Insect					
<u>NONTARGET INSECT TESTING - POLLINATORS:</u>					
141-1 - Honey bee acute contact LD50	TGAI	B,G	NO		YES
141-2 - Honey bee - Toxicity of residues on foliage	TEP	B,G	NO		NO <sup>1/</sup>
141-4 - Honey bee subacute feeding study	[Reserved] <sup>2/</sup>				
141-5 - Field testing for pollinators	TEP	B,G	NO		NO <sup>1/</sup>
<u>NONTARGET INSECT TESTING - AQUATIC INSECTS</u>					
142-1 - Acute toxicity to aquatic insects	[Reserved] <sup>3/</sup>				
142-2 - Aquatic insect life-cycle study	[Reserved] <sup>3/</sup>				
142-3 - Simulated or actual field testing for aquatic insects	[Reserved] <sup>3/</sup>				
143-1 <u>NONTARGET INSECT</u> thru <u>TESTING-PREDATORS</u> 143-3 <u>AND PARASITES</u>	[Reserved] <sup>3/</sup>				

Composition: TGAI = Technical grade of the active ingredient; TEP = Typical end-use product.

The use patterns are coded as follows: A = Terrestrial, Food Crop; B = Terrestrial, Non-Food; C = Aquatic, Food Crop; D = Aquatic, Non-Food; E = Greenhouse, Food Crop; F = Greenhouse, Non-Food; G = Forestry; H = Domestic Outdoor; I = Indoor.

- 1/ Requirement deferred pending evaluation of data from the acute contact test.
- 2/ Reserved pending development of test methodology.
- 3/ Reserved pending Agency decision as to whether the data requirement should be established.

TABLE A  
GENERIC DATA REQUIREMENTS FOR 2,4-DP, ISOCTYL ESTER

Data Requirement	Composition	Use Pattern	Does EPA Have Data To Satisfy This Requirement? (Yes, No, or Partially).	Bibliographic Citation	Must Additional Data Be Submitted Under FIFRA Section 3(c)(2)(B)?
§158.155 Nontarget Insect					
<u>NONTARGET INSECT TESTING - POLLINATORS:</u>					
141-1 - Honey bee acute contact LD50	TGAI	B,G	NO		YES
141-2 - Honey bee - Toxicity of residues on foliage	TEP	B,G	NO		NO <sup>1/</sup>
141-4 - Honey bee subacute feeding study	[Reserved] <sup>2/</sup>				
141-5 - Field testing for pollinators	TEP	B,G	NO		NO <sup>1/</sup>
<u>NONTARGET INSECT TESTING - AQUATIC INSECTS</u>					
142-1 - Acute toxicity to aquatic insects	[Reserved] <sup>3/</sup>				
142-2 - Aquatic insect life-cycle study	[Reserved] <sup>3/</sup>				
142-3 - Simulated or actual field testing for aquatic insects	[Reserved] <sup>3/</sup>				
143-1 thru 143-3 <u>NONTARGET INSECT TESTING-PREDATORS AND PARASITES</u>	[Reserved] <sup>3/</sup>				

Composition: TGAI = Technical grade of the active ingredient; TEP = Typical end-use product. The use patterns are coded as follows: A = Terrestrial, Food Crop; B = Terrestrial, Non-Food; C = Aquatic, Food Crop; D = Aquatic, Non-Food; E = Greenhouse, Food Crop; F = Greenhouse, Non-Food; G = Forestry; H = Domestic Outdoor; I = Indoor.

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