

4/12/83

034401
Shaughnessy No.

Date out of EFB: **12 APR 1983**

To: W. Miller
Product Manager #16
Registration Division (TS-767)

From: R. Moraski, Head (acting) *R Moraski*
Review Section 1
Exposure Assessment Branch
Hazard Evaluation Division (TS-769c)

FILE COPY

Attached please find the EFB review of...

Reg./File No.: 239-1623

Chemical: Naled

Type Product: Insecticide

Product Name: _____

Company Name: Ortho

Submission Purpose: Response to data gap

ZBB Code: other

ACTION CODE: 400

Date In: 1/6/83

EFB # 132

Date Completed: 4/12/83

TAIS (level II) Days

Deferrals To:

67 0.5

_____Ecological Effects Branch

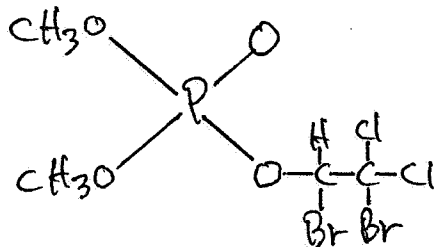
_____Residue Chemistry Branch

_____Toxicology Branch

1.0 INTRODUCTION

- 1.1 Chevron is responding to a previous review (Oct. 13, 1982) of a photodegradation study of naled that found the study invalid due to the lack of information as to whether sterile water and glassware were used. Acc. No. 247705 for the study.

- 2.0 Naled (technical)
1,2-dibromo-2,2-dichloroethyl dimethylphosphate



3.0 DISCUSSION

- 3.1 Chevron indicates in the attached letter that the study followed EPA guidelines in using deionized water and acetone-sterilized glassware.

4.0 CONCLUSION AND RECOMMENDATION

- 4.1 The response by Chevron Chemical Company to the question of type of water/sterilization procedure of a previously submitted aqueous photodegradation study does not answer the primary and important question whether the water used, be it deionized or distilled, was itself sterilized.
- 4.2 In response to an EAB request to the PM to question Chevron on this point, we learned that sterilized water was not used in the study.
- 4.3 EAB does not consider the photodegradation study in question valid due to this incorrect procedure.
- 4.4 The photodegradation data requirement has still not been satisfied and is considered a data gap.

Herbert L. Manning

Herbert L. Manning
Review Section No. 1
EAB/HED



Chevron Chemical Company

940 Hensley Street, Richmond, CA 94804

December 14, 1982

Research and Development
Agricultural Chemicals Division

CHEVRON Naled Technical
(EPA Reg. No. 239-1633)
Photodegradation
EPA Accession No. 247715
File No: 771.1991

Mr. William H. Miller
Product Manager (16)
Registration Division (TS-767)
U. S. Environmental Protection Agency
Washington, D.C. 20460

Dear Mr. Miller:

In your letter of October 29, 1982, you asked whether sterile water and glassware were used in the above photodegradation study.

The study was done following current EPA guidelines [§ 161-2(c) (2)(iii)]. This requires distilled or deionized water and sterilized glassware. Our naled study used deionized water and glassware sterilized with acetone.

We anticipate that this information will allow your validation of this study (EPA Accession No. 247715).

Sincerely yours,

A handwritten signature in cursive script, appearing to read "L. R. Stelzer".

L. R. Stelzer, Manager
Registration & Regulatory Affairs

THL:mla