034401

9/21/79 (10)

EEE BRANCH REVIEW

DATE: IN 1-30-79 OUT 9-21-79 IN _____ OUT _____ IN _____ OUT _____
FISH & WILDLIFE ENVIRONMENTAL CHEMISTRY EFFICACY

FILE OR REG. NO. 239-1721/239-1633

PETITION OR (EXP. PERMIT NO.) _____

DATE DIV. RECEIVED 1-30-79

DATE OF SUBMISSION 1-29-79

DATE SUBMISSION ACCEPTED _____

TYPE PRODUCT(S):(I) D, H, F, N, R, S _____

DATA ACCESSION NO(S). _____

PRODUCT MGR. NO. 16

PRODUCT NAME(S) Dibrom-14C (conc.)/Naled (Tech.)

COMPANY NAME Chevron Chem. Co.

SUBMISSION PURPOSE _____

CHEMICAL FORMULATION _____

Naled

100 Pesticide Label Information

100.2 Formulation Information

Naled (91.6% Technical); Dibrom 14C (85% technical Naled)

101 Physical and Chemical Properties

101.1 Chemical Name

1,2 dibromo - 2, 2 dichloroethyl dimethyl phosphate

101.3 Common Name

Naled, dibrom

103 Toxicological Properties

103.2 Minimum Requirements

103.2.4 Aquatic Invertebrate LC_{50}

Daphnia magna 48 hr LC_{50}
Naled 0.0003 mg/l
Dibrom 0.0005 mg Naled/l

107 Conclusions

107.4 Data Adequacy Conclusions

Both studies, on technical Naled and on Dibrom 14C, are scientifically sound and show that both compounds are very highly toxic to aquatic invertebrates. However, it is the EEB's understanding that the percent active ingredient of Dibrom 14C is 85% Naled by weight. However, the sample used in the study for the formulated product is reported to contain 82.6% Naled; therefore, this study will be considered supplementary until the rationale for using the lower percent active ingredient is known. The study using technical grade Naled, however, does fulfill the requirement for an aquatic invertebrate acute LC_{50}.

Appendix: Data Evaluation Record (Naled)
Data Evaluation Record (Dibrom 14C)

Carol Matti Natella
Wildlife Biologist
Ecological Effects Branch/HED

Richard Balcomb
Wildlife Biologist
Ecological Effects Branch/HED

Clayton Bushong
Chief
Ecological Effects Branch/HED

December 4, 1979

48-hour aquatic invertebrate LD_{50} using Dibrom 14C

Wildlife Biology, Section #1, EEB, HED

Mr. William H. Miller

THRU: Mr. Raymond Matheny, Section Head

THRU: Mr. Clayton Bushong, Chief, Ecological Effects Branch, HED

In response to the letter of November 14, 1979 from L.R. Stelzer of Chevron Chemical Company, we concur with his opinion that repeating the LD_{50} Daphnia study using Dibrom 14C is not justified.

According to the information supplied by the registrant, the sample used in the study was reported to contain 82.6% Naled instead of 85%. We therefore calculated a deficiency of only 2.4%, instead of the 2.8% reported in Stelzer's letter.

Carol M. Natella
Carol M. Natella

C.Natella: emg 12-12-79 TS-769,CM2,RM807, (77725)

Chevron
ORTHO
Chevron Chemical Company
940 Hensley Street, Richmond, CA 94804

November 14, 1979

DIBROM 14 Concentrate
EPA Reg. No. 239-1721
Daphnia LD_{50} Study

Mr. William H. Miller
Product Manager (16)
Insecticide-Rodenticide Branch
Registration Division (TS-767)
Environmental Protection Agency
Waterside Mall, East Tower
Washington, D.C. 20460

Dear Mr. Miller:

Your letter of November 5, 1979 concerning the acute LD_{50} study with Daphnia conducted with DIBROM 14 Concentrate which was under guarantee has been received. The product contains 85% naled. The sample used for this toxicology test was found to contain about 2.8% less than guarantee and should not have been used for this test.

We believe that since the naled technical study was found to be acceptable, and also that the 2.8% deficiency for the 14C is not likely to appreciably affect the results obtained in the Daphnia test, that we are hardly justified in repeating this study with a correct sample of 14C at this time.

We appreciate your having brought this to our attention.

Yours very truly,

L. R. Stelzer, Manager
Registrations and Regulatory Affairs

JPT:db

0204 NOV 79

DATE PULLED | DATE PUBLISHED | ACTION TYPE | CODE | 12. OUTGOING DATE: MO. DAY YR.

REVIEW TYPE	REVIEW CODE	SIGNATURE OF REVIEWER	COMMENT CODE	DATE REVIEW COMPLETED: MO. DAY YR.
A RESPONSIBILITY AREA				

Chevron Chemical Co.
940 Hensley Street
Richmond, CA 94804

D Gentlemen: AND TEAM SUPERVISOR REVIEW

Subject: Dibrom 14 Concentrate
EPA Registration No. 239-1721

PRODUCT MANAGER

The 48-hour acute static toxicity of naled technical to Daphnia study has been reviewed and is acceptable.

The aquatic invertebrate LD_{50} study using Dibrom 14C will be acceptable pending clarification of the following:

It is our understanding that the percent active ingredient of Dibrom 14C is 85% naled by weight. The sample used in the study was reported to contain 82.6% naled. This study will be considered supplementary until the rationale for using the lower percent active ingredient is known.

The EPA Accession Numbers below have been assigned to the volumes of data submitted with these applications.

241219	NALED TECHNICAL
241220	DIBROM 14C

Sincerely,

William H. Miller
Product Manager (16)
Insecticide-Rodenticide Branch
Registration Division (TS-767)

LLER:jem147:TXA3:RAVEN:X479-2018:10-31-79:#01046