

EEE BRANCH REVIEW

DATE: IN \_\_\_\_\_ OUT \_\_\_\_\_ IN 5/4/76 OUT 5/10/76 IN \_\_\_\_\_ OUT \_\_\_\_\_  
FISH & WILDLIFE ENVIRONMENTAL CHEMISTRY EFFICACY

FILE OR REG. NO. 201-274

PETITION OR EXP. PERMIT NO. \_\_\_\_\_

DATE DIV. RECEIVED 3/5/76

DATE OF SUBMISSION 3CID-(no)-2B

DATE SUBMISSION ACCEPTED \_\_\_\_\_

TYPE PRODUCT(S): (1) D, H, F, N, R, S

PRODUCT MGR. NO. R. Gee (16)

PRODUCT NAME(S) Bidrin 8 Water Miscible Insecticide (82%)

COMPANY NAME Shell Chemical Company

SUBMISSION PURPOSE Submits requested test protocol, and objections to additional work.

CHEMICAL & FORMULATION Dimethyl phosphate of 3-hydroxy N, N-dimethyl-cis-crotonamide  
(Bidrin)

1.0 Introduction

1.1 The review of the environmental data package (5/75) noted several deficiencies. The first response (10/75) related only to question 5c of our letter (5/15/75); the procedure for obtaining this data was requested.

1.2 Shell's second response (2/27/76) contains:

(A) The requested procedure relating to question 5c testing.

(B) Comments that Bidrin's adverse effects on soil organisms is transient and not significant.

(1) Reference is made to studies in the package.

(a) "...Bidrin was applied 4 times at 10-lb/A, directly to the soil; residue levels (resulting) were of no magnitude to occasion concern..."

(b) "...Soil studies showing Bidrin is rapidly degraded by soil microorganisms."

(c) "During years of widespread practical use... there has been no evidence of any adverse effect..."

2.0 Direction for Use

Refer to the review of 10/22/75.

3.0 Discussion of Data

See previous review.

4.0 Recommendations

4.1 Your letter of February 27, 1976 notes that the studies requested in items 1 through 4 of our May 15 letter are in progress.

4.2 At this time we will accept the data and discussion presented to answer questions 5(A)(B)(D) and (E) of our letter May 15 and November 25, 1975, but wish to point out that under Section 3 of the Regulation this may not be acceptable for new uses. Those studies which were requested may be needed to satisfy the new requirements. We can only make that judgement when an application for use is made under the new regulation.

*Ronald E. Ney, Jr. 5/10/76*

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Environmental Chemistry Section  
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