ENVIRONMENTAL CHEMISTRY EVALUATION FOR: endothall (7-0xabicycle(2.21) heptane-2,3-dicarboxylic acid] as the mono(N,N-dimethylalkylamine) salt

PP# 4G1449; Req. No. 4581-EXP

Penwalt Corporation : Ltr. 12/7/73

I. INTRODUCTION

1. This petition (PP#4G1449) requests a temporary permit for the use of endothall on rice. The data for this petition are the same as those submitted with PP#3F1416 which requested full registration for the use of endothall on rice.

PP#3F1416 registration was not approved because of inadequate performance data. In addition, Ney and Cook objected to registration in their review of environmental data on 2/27/74, for the following reasons:

- 1. Submit the residue data on upland crops receiving irrigation water from treated rice fields when available.
- 2. The implied environmental safety claim "This product is biodegradable" should be deleted.
- 3. It is our understanding that fish in rice field in California are not used for food or feed. If this is not true, a fish residue accumulation study may be needed. Please varify with California Agriculture Extension people. Data may be needed to support the 3 day restriction in "Do not use fish from treated water for food or feed within 3 days after treatment.
- 4. If a rice use is proposed in areas outside of California, a crawfish and catfish residue accumulation study may be needed.

The petitioner was informed of these objections.

- 2. The product name is Hydrothol 191 Rice Herbicide.
- 3. See previous evaluation particularly PP#0F0972 of 6/8/70 PP#3F1416 of 2/27/74, and 1F1105 of 11/1/70.
- 4. Endothall is registered for use in lakes, ponds and several crops.

5. The propose experimental program calls for use of 10,000 lbs endothall acid (equivalent to 200,000 lbs of 5% granular formulation) in treating 5,000 acres of rice grown in seven California counties.

II. DISCUSSION OF DATA

As mentioned above this petition provides no new data and incorporated the data of PP#3F1416 by reference. Therefore, please refer to the evaluation of PP#3F1416 of 2/27/74. The directions for use are the same as those reviewed in PP#3F1416.

III. RECOMMENDATION

Object to permit. The implied environmental safety claim, "This product is biodegradable" should be deleted.

For full registration considerations, recommendations 1,3, and 4 in the evaluation of PP#3F1416 should be satisfied.

Ronald E. Ney, Jr. 5/22/74 Franklin D.R. Gee

Environmental Chemistry Section Efficacy and Ecological Effects Branch

gj1:6/3/74