

T112

DP Barcode : D192945
PC Code No : 081901
EEB Out : JUL 30 1993

To: Walter Waldrop
Product Manager 71
Special Review and Reregistration Division (H7508W)

From: Anthony F. Maciorowski, Chief
Ecological Effects Branch/EFED (H7507C)

Attached, please find the EEB review of...

Reg./File # : 081901
Chemical Name : Chlorothalonil
Type Product : fungicide
Product Name :
Company Name : ISK Biotech
Purpose : Rebuttal concerning imposition of new data
requirement (72-3d - estuarine/marine toxicity fish - TEP)

Action Code : 614 Date Due : 9/01/93
Reviewer : Tracy L. Perry

EEB Guideline/MRID Summary Table: The review in this package contains an evaluation of the following:

GDLN NO	MRID NO	CAT	GDLN NO	MRID NO	CAT	GDLN NO	MRID NO	CAT
71-1(A)			72-2(A)			72-7(A)		
71-1(B)			72-2(B)			72-7(B)		
71-2(A)			72-3(A)			122-1(A)		
71-2(B)			72-3(B)			122-1(B)		
71-3			72-3(C)			122-2		
71-4(A)			72-3(D)	WAIVED		123-1(A)		
71-4(B)			72-3(E)			123-1(B)		
71-5(A)			72-3(F)			123-2		
71-5(B)			72-4(A)			124-1		
72-1(A)			72-4(B)			124-2		
72-1(B)			72-5			141-1		
72-1(C)			72-6			141-2		
72-1(D)						141-5		

Y=Acceptable (Study satisfied Guideline)/Concur

P=Partial (Study partially fulfilled Guideline but
additional information is needed)

S=Supplemental (Study provided useful information but Guideline was
not satisfied)

N=Unacceptable (Study was rejected)/Nonconcur

DP BARCODE: D192945

REREG CASE # 0097

CASE: 819269
SUBMISSION: S444237

DATA PACKAGE RECORD
BEAN SHEET

DATE: 07/13/93
Page 1 of 1

* * * CASE/SUBMISSION INFORMATION * * *

CASE TYPE: REREGISTRATION ACTION: 614 DATA WAIVER REQ SUB
CHEMICALS: 081901 Chlorothalonil 100.00 %

ID#: 081901

COMPANY:

PRODUCT MANAGER: 71 WALTER WALDROP 703-308-8062 ROOM: CS1 3B3
PM TEAM REVIEWER: ANDREW W ERTMAN 703-308-8063 ROOM: CS1 32B5
RECEIVED DATE: 07/13/93 DUE OUT DATE: 09/21/93

* * * DATA PACKAGE INFORMATION * * *

DP BARCODE: 192945 EXPEDITE: N DATE SENT: 07/13/93 DATE RET.: / /
CHEMICAL: 081901 Chlorothalonil
DP TYPE: 001 Submission Related Data Package
ADMIN DUE DATE: 09/01/93 CSF: N LABEL: N

ASSIGNED TO	DATE IN	DATE OUT
DIV : EFED	07/13/93	/ /
BRAN: EEB	07/13/93	/ /
SECT:	/ /	/ /
REVR :	/ /	/ /
CONTR:	/ /	/ /

* * * DATA REVIEW INSTRUCTIONS * * *

Please evaluate the attached rebuttal by ISK Biotech regarding the imposition of a new data requirement for CHLOROTHALONIL. 72-3d Estuarine/Marine Toxicity Fish was imposed in a 1/12/93 EEB review for various reasons. ISK has four points that they want addressed before going ahead with this new study. Thanks for your help.

* * * ADDITIONAL DATA PACKAGES FOR THIS SUBMISSION * * *

DP BC	BRANCH/SECTION	DATE OUT	DUE BACK	INS	CSF	LABEL
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JUL 30 1993

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Chlorothalonil: rebuttal concerning imposition of new data requirement (72-3d Estuarine/Marine Toxicity Fish - TEP).

FROM: Anthony Maciorowski, Branch Chief *Anthony Maciorowski*
Ecological Effects Branch
Environmental Fate and Effects Division (H7507C)

TO: Walter Waldrop, PM 71
Reregistration Branch
Special Review and Reregistration Division (H7508W)

ISK Biotech has submitted a rebuttal to EEB's imposition of a new data requirement (72-3d Estuarine/Marine Toxicity Fish - TEP) for chlorothalonil (EEB review 1/12/93). This study was required for the cranberry use only as the formulated product (54% ai flowable concentrate) was more toxic to the bluegill sunfish than the technical grade of the active ingredient.

At the time that the estuarine fish study (72-3d) was required, EFGWB had not completed its review of the aerobic aquatic metabolism study with chlorothalonil (MRID No. 42226101). This study fulfilled guideline requirements and demonstrated that chlorothalonil is rapidly metabolized (first $t_{1/2}$ = ca. 1-2 hrs) and none of the identified degradation products appear to persist (EFGWB review, 2/8/93).

Based on this additional environmental fate information, chlorothalonil is not expected to persist in sufficient concentrations to be of toxicological concern in estuarine/marine environments. Therefore, the guideline requirement for formulated product toxicity testing with estuarine/marine fish (72-3d) is waived.

If you have any questions, please contact Tracy Perry at 305-6451 or Henry Craven at 305-5320.



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