

August 6, 1971

ReEvaluation No. 3 of PP No 1 # 1024 for Doconil
Diamond Shamrock Chemical Corporation
Filed May 4, 1971

On July 22, 1971 Messrs Ney, Sanders, Collier, Gilber, Stallord,
Duone and Harris discussed Doconil data.

F. T. Bandes' evaluation of 7/15/71 was used as a basis for discussion.

All points were satisfactorily resolved except:

1) Pr-70-15 data on fish residue buildup was not available.

2) Fate of ~~Compound~~ DAC-3701 in soil.

- a) Can it leach into ground water?
- b) If so, how much?
- c) What is its half life under field conditions?

3) It was pointed out that a paucity of data existed on break-down in various soil types.

Dr. Eisler and associates indicated that they would respond to point #2 in more detail since they felt this could be done by referencing previous data.

On 7/28/71, they responded to our question pertaining to leaching of DAC 3071.

An evaluation of their 7/28/71 reply from Dr. Eisler did not allow chemistry to conclude that "residues of DAC -3701 cannot reach the water table".

Field data submitted in the 7/28/71 respond was for muck soil only. Leaching is minimal in this type of soil since it has a high exchange capacity.

Degradation of 3701 in clay and loam soils is slow enough to allow significant leaching in these types. Also, these data were obtained under drastic conditions (incubation at 35-37 C).

Therefore, we must assume from data supplied that Deconil rapidly breaks down to 3701 which rapidly leaches but slowly degrades.

We request a re-evaluation by Dr. Cueto of this petition on the basis of possible low level residues resulting in shallow well water supplies.

If the possibility of low level in water does not present an impediment to registration, chemistry is in a position to discuss test protocols aimed at evaluating the rates of leaching and magnitude, if any, of ground water contamination.

It is not anticipated that well water levels would exceed 0.1 ppm. It should be noted that tolerance of up to 15ppm have been allowed in crop material. This tolerance include DAC-3071/.

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With human safety's concurrence, we would not object to registration if the following data requirements were met within a 1 year period after the granting of registration:

1.) Tests be performed to demonstrate any leaching problem if any, of DAC-3701 in sandy loam type soil during and after application of 5 weekly treatments of Deconil @ 2 lbs A/A. Tests protocols would be established by PRD, after discussion with registrant.

2.) Fish residues data as required by PR-70-15 for DAC 3071 and DAC 3071 including effect of temperature, pH and sunlight.

3.) Data on aqueous stability of DAC 3071 including effect of temperature, pH and sunlight.

4.) Any other unanswered portions of 70-15:

This evaluation supersedes evaluation by Sanders (7/15/71) and Ney (7/27/71). However, all major issues in these evaluations other than those mentioned above were classified to the satisfaction of Ney, Sanders and Collier.