



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

APR 27 1993

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OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

MEMORANDUM

**SUBJECT:** TPTH Estuarine/Marine Study Requirements

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

**TO:** Eric Ferris, Product Manager Team Reviewer,  
Team 71  
Special Review and Reregistration Division (H7508W)

This memorandum is to document that EEB has received both SRRD's letter to Hoechst Celanese Corp. of February 2, 1993 and Griffin Corp. letter of March 4, 1993 concerning estuarine and marine studies requirement. It is our understanding that the Griffin Corp. has agreed to conduct the following guideline studies and provide this data within one year from the date of the receipt of SRRD's letter:

- 72-3a Acute Estuarine/Marine (fish)
- 72-3b Acute Estuarine/Marine (mollusk)
- 72-3c Acute Estuarine/Marine (shrimp)

Please contact Dennis McLane of EEB if any further information is needed. (305-5096).



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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

CERTIFIED MAIL P551-250

Dr. Berthold Volger  
 Regulatory Affairs  
 Hoechst Celanese Corporation  
 Route 202-206  
 PO Box 2500  
 Somerville, NJ 08876-1258

FEB 2 1993

Dear Dr. Volger:

SUBJECT: TPTH Ecological Effects Studies

On September 23, 1991 and October 29, 1991 you wrote to the Agency in regard to certain data requirements imposed on TPTH registrants in the September 28, 1990 DCI. The Agency has considered your requests and determined the following:

- Guidelines 71-4A and 71-4B will not be waived. These data are due on January 1, 1994, consistent with the TPTH Task Force's extension request of October 13, 1992 (in a letter from Jack Skwara of Atochem).
- Guidelines 72-3A, 72-3B, and 72-3C may be waived if all TPTH labels are amended to prohibit use in coastal counties.

Within ninety days from the date of your receipt of this letter, you must submit amended labels prohibiting the use of TPTH in coastal counties. If you choose not to make these label amendments, you must, within thirty days from the date of your receipt of this letter, inform the Agency, in writing, of your decision and commit to conduct the guideline 72-3A, B, and C studies and submit them to the Agency within one year from the date of your receipt of this letter.

Failure to adequately respond within the timeframes provided may result in the issuance of a Notice of Intent to Suspend, affecting the registration of TPTH. If you have any questions, call Eric Feris, the Review Manager for this chemical through the Virginia Relay (1-800-828-1140) at (703) 308-8048.

Sincerely,

*Lois A. Rossi*

Lois Rossi, Chief  
 Reregistration Branch  
 Special Review and  
 Reregistration Division

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CONCURRENCES

SYMBOL ▶	H7508W	H7508W	H7508W					
SURNAME ▶	E. FERIS	Waldrop	RICE					
DATE ▶	Dec 23, 1992	1/22/93	1/25/93					



March 4, 1993

Ms. Lois Rossi, Chief  
Reregistration Branch  
Special Review and Reregistration Division  
United States Environmental Protection Agency  
401 M. Street, S.W.

Subject: TPTH Ecological Effects Studies

I am in receipt of your letter of February 2, 1993 to Dr. Berthold Volger (received by Dr Volger on February 8, 1993) on the above subject. Griffin Corporation, as the primary registrant of products containing TPTH in the United States, has determined that there is sufficient need for the use of TPTH products in the coastal counties to render the prohibition against use in coastal counties unacceptable.

Accordingly, Griffin Corporation hereby commits to conduct the Guideline studies 72-3a, 72-3b, and 72-3c acute  $LC_{50}$  esturine and marine organisms testing. As outlined in your letter, we will submit the data to the Agency within one year from the date of receipt of your letter.

Please advise if you have questions.

Sincerely,  
GRIFFIN CORPORATION

A handwritten signature in cursive script that reads "L. Vernon White".

L. Vernon White, Director  
Registration and Regulatory Affairs

CC: Mr. John Skwara, Elf Atochem  
Dr. Berthold Volger, Hoechst Celanese

Griffin Corporation  
P.O. Box 1847, Rocky Ford Road  
Valdosta, GA 31603-1847, U.S.A.  
Telephone: (912) 242-8635  
Telex U.S.: 682-7210 GRIFFIN  
Telex Intl.: 686-8694 GRIFINTL  
Fax: 912-244-5813



3 Handwritten initials or a mark, possibly "D" or "Q", next to the number "3".