



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

SEP 7 1993

Mr. Douglas M. Roby
DowElanco
Quad III/2
9002 Purdue Road
Indianapolis, IN 46268-1189

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

SUBJECT: Review of waiver request for solubility profile to
upgrade the Invertebrate Toxicity Study with Daphnia
for the chemical benfluralin (benefin).

Dear Mr. Roby:

The Agency has reviewed the waiver request for a solubility
profile to upgrade the Invertebrate Toxicity Study with Daphnia,
MRID 145757, guideline 72-2(a), for the chemical benfluralin
(Chemical Number 84301, Case 2030) and has reached the following
decision.

The Agency grants the waiver request provided that your
submission of an Invertebrate Toxicity Study with Daphnia, MRID
42390702, guideline 72-2(b), which utilized the TEP as the test
substance is acceptable.

This study, if acceptable, can be used to satisfy both the
72-2(a) and 72-2(b) guideline requirements.

If you have any questions regarding this letter, please
contact Tom Myers in the Accelerated Reregistration Branch at
(703) 308-8074.

Sincerely yours,

Jay Ellenberger, Chief
Accelerated Reregistration Branch
Special Review and
Reregistration Division

cc: Joanne Miller, PM-23/
Alvaro Yamhure, EEB



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