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			Shaughnessy Date Out of		06201 CI <b>2</b> 6	1987
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To:	Dennis Edwards Product Manager 12 Registration Division	(TS-767)				
From:	Therese M. Dougherty, Environmental Fate Rev Exposure Assessment Br Hazard Evaluation Divi	iew Section #1 anch	ID)		,	i e
Attach	ed, please find the EAB	review of				
Reg./F	ile # : 45639-EUP-27		ing the spirit of the spirit o			
Chemic	al Name: Amitraz			,,	, , , , , , , , , , , , , , , , , , ,	
Type P	roduct : Insecticide		e. Noona ta kanana ka ayaa ka ka ayaa ka a	<del>- ( </del>	<del></del>	-
Produc	t Name : MITAC EC				-	
Company	y Name : NOR AM	e e e e e e e e e e e e e e e e e e e				
Purpos	EUP for use on	Cotton	e languarine i angla ani geometri e e e e e e e e e e e e e e e e e e e	·		-
Date 1	Received: 7/22/87		ion Code: 75	6		-
Date Co	completed: OCT 26 19	O! ————	AB #(s) : 70	823	<del>- * ; ; ; ; ; ;</del>	
Monito	ring study requested:	<u> </u>	otal Reviewi	ng Time:	1.00	day
Monito	ring study voluntarily:	<del>jilajida paja</del>		-		•
Deferra	als to:	Ecological Effe	ects Branch			
		Residue Chemist	ry Branch			,
	<del></del>	Toxicology Bran	nch			

- 1.a CHEMICAL: Amitraz.
- 1.b Physical Properties: Not included with this submission.
- 2. TEST MATERIAL: N/A.
- 3. STUDY/ACTION TYPE: An EUP request for use on Cotton.
- 4. STUDY IDENTIFICATION: N/A
- 5. REVIEWED BY:

Akiva D. Abramovitch, Ph.D. Chemist

Environmental Chemistry Review Section 1/EAB/HED/OPP

How Hanoutel Date: OCT 26 1987

6. APPROVED BY:

Therese M. Dougherty, Chief Environmental Chemistry Review Section 1/EAB/HED/OPP

Date: OCT 26 1987

## 7. CONCLUSIONS:

EAB does not concur with the registrant's request for an EUP on Cotton.

The Registration Standard on Amitraz of Sept. 19, 1984 indicates that the basic data requirements for the EUP on Cotton, hydrolysis, aerobic soil, fish accumulation, leaching and crop rotation remain unsatisfied. In addition, the available soil TLC leaching data from the Registration Standard, in partial fulfillment of the leaching data requirement, indicate that Amitraz has intermediate mobility in sandy loam, silt loam and clay soils and high mobility in sand to warrent concern about ground water contamination (see attachments).

## 8. RECOMMENDATIONS:

EAB recommends that an EUP should not be granted until all the data requirements for the EUP are satisfied and the leaching potential and the risks associated with Amitraz entering groundwater are fully assessed.

## 9. BACKGROUND:

- A. Introduction: See the Registration Standard on Amitraz of Sept. 19, 1984.
- B. <u>Directions for Use</u>: The experimental plan for using Amitraz on cotton was not specified. The label for Mitec 1.5 EC on cotton is attached.
- 10. DISCUSSION OF INDIVIDUAL TESTS OR STUDIES: N/A
- 11. COMPLETION OF ONE LINER: Not completed.
- 12. CBI APPENDIX: None.