

MEMORANDUM OF CONFERENCE

BETWEEN: J. Norton, J. Barnett, and L. Newby of CIBA-GEIGY.

AND: R. Felthausen, H. Craven, and H. Jacoby PRD

SUBJECT: Metholachlor, DUALTM SEC
Chronic Fish and Predator Studies

DATE: May 17, 1977

The following are the significant points made during the conference:

- 1.0) The appropriate protocol is the Columbia protocol using the fathead minnow. This is an egg to egg chronic fish study.
- 2.0) There is no equation for determining the rates for the chronic study. Normally a dynamic study is run with the test species to establish toxicity. Based on this study and using an appropriate safety factor, rates for the test can be set.
- 3.0) PRD will stick with the two (2) year after registration date for submission of the chronic fish study data. This is conditioned on the fact that a ~~best~~ (catfish) ~~best~~ accumulation study will be submitted and a letter of intent is received concerning the chronic study. This is further conditioned that no adverse determination is made regarding long term effects of metholachlor.
- 4.0) ".....hazards to non-target organisms....." statement in EUP Letter probably will be satisfied by the food chain study, which has not been submitted for evaluation.
- 5.0) The predator study eluded to in the same EUP Letter is not required data or a test at the present time. Should a study examining the effects of chemicals on the predator chain be required by the Agency, Metholachlor may be a candidate.

Meeting 9:00

Ciba-Geigy

Registrants:

Mr. F.C. Vawley

Mr. Jack Norton

Mr. John Barnett

P.M.: H. Jacoby

Environmental Safety

H. Craven

R. Fethouzin

Product:

Dual - CGA-24705

550 at non
edible

Bluegill Sunfish

Bionomics only 1 tenth percent of fish considered non-edible. Non edible portion showed high bioaccumulation factors

90% edible - 10% non-edible.

Whole fish equivalency 78 X at 90:10

70% " 30% in 180 at 70:30

Channel Catfish (Guidelines require)
must be conducted

.01
2- Compartment Storage — At removal
non-edible being metabolize & stored in edible?

zooplankton

< C₅₂

fat-head
minnow

Do they need Chronic studies before
registration?

Have not conferred with Ray i.
really can't provide an answer.

E. S. Concerns + just. for
Soluble in H₂O at 520 ppm Chronic
Adsorbs to soil Studies
Absorbs to soil
1/2 life 5, 7, 9 > 200 days

Not singly persistent under 1
type of condition but under numerous
conditions.

2 ppm on rainbow trout
No CI expressed with figures.

Amendment aerial application.

Ciba Geigy

Barnett - What exposure levels? &

Cramer - For conducting study will
establish no effect level + ^{Chronic} studies
would be conducted below this level.

Caven — In answer to question about
delay in registration due to data
gap.

Not really concerned about edible vs. non edible —
this is really a tolerance problem.