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8 DEC 1980

ICI Americas, Inc.
Wilmington, DE 19897

Attention: Judith A. Gleve

Gentlemen:

Subject: Baquacil
EPA File Symbol 10182-RO
Resubmission of September 11, 1980

The teratogenic, primary dermal irritation, and 48-hour aquatic invertebrate studies submitted for this product are acceptable; however, the 96-hour warmwater and 96-hour coldwater fish studies are unacceptable.

The 96-hour warmwater fish study is not sound and does not fulfill the requirements for a warmwater fish acute LC_{50} for the following reason: A 21% dissolved oxygen does not meet the guideline requirements, which states the dissolved oxygen after 48 hours must be between 40% and 100% saturation.

The 96-hour coldwater fish study indicates Baquacil is moderately toxic to Rainbow Trout with an LC_{50} of 3.2 mg/L. This study does not fulfill the guidelines requirements for a coldwater fish study for the following reasons:


1. The fish weighed 16.4 g instead of 0.5 to 1.0 gram as outlined in EPA protocol of April 1975.
2. The binomial is not an acceptable method in calculating fish LC_{50} values. One treatment other than the control must have killed or affected less than 35% of the organisms exposed to it, and one treatment must have killed or affected more than 65% of the organisms.

No further consideration can be given to this application for registration of a new chemical until acceptable trout and bluegill studies are submitted.

A comprehensive review of the label and pool owner's guide will be forthcoming under separate cover.

This product cannot be legally marketed in channels of trade until it has been registered.

Sincerely,


A. E. Castillo
Product Manager (32)
Disinfectants Branch
Registration Division (TS-767)

TS-767-Castillo:Francis:cag:DCR#15877:Wang:2180C:RAVEN:479-2018:12/4/80

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