

Date Out EFB: MAY 14 1982

To: Product Manager 12 Ellenberger
TS-767

From: Dr. Willa Garner lll
Chief, Review Section No. 1
Environmental Fate Branch

Attached please find the environmental fate review of:

Reg./File No.: 264-GUR, 264-GUE

Chemical: Thiodicarb

Type Product: Insecticide

Product Name: Larvin 500 Thiodicarb Insecticide

Company Name: Union Carbide

Submission Purpose: Response to EFB comments

ZBB Code: other

ACTION CODE: 111

Date in: 3/1/82

EFB # 214, 215

Date Completed: MAY 14 1982

TAIS (level II) Days

Deferrals To: 61 2

 Ecological Effects Branch

 Residue Chemistry Branch

 Toxicology Branch

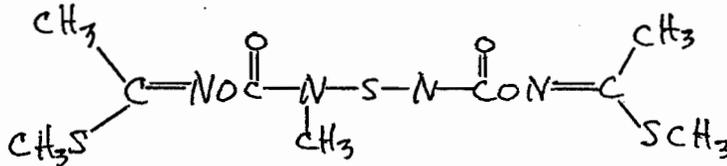
~~12~~ 1

1.0 Introduction

Chemical Name and Type Pesticide: thiodicarb, N,N¹[thiobis [(methylimino)carbonyloxy]]bis-dimethyl ester, Insecticide 45.8% ai. in Larvin 500 Thiodicarb Insecticide.

Trade Name: Larvin 500 Thiodicarb Insecticide.

Chemical Structure:



Union Carbide is responding to our comments (see attached letters) in a previous review (1 May 1981) regarding product chemistry, field dissipation, aerobic nitrogen fixation, and rotational crop restrictions.

2.0 Directions for Use

Does not apply to this submission.

3.0 Discussion of Data

3.1 Field Dissipation Study

Union Carbide agreed that their study had shortcomings and have reviewed the protocol (attached). The protocol is satisfactory, but they did not include the soil residue analytical method they plan to use.

3.2 Rotational Crop Study

While Union Carbide has added our rotational crop restriction to their labels, they want to eliminate them altogether, and have revised the protocol for this study (see attached copy).

3.3 Aerobic Nitrogen Fixation Study

Their only response to our comment on this study pointed out that it is not now an EPA data requirement.

3.4

This was submitted and a copy is attached.

4.0 Recommendation

Union Carbide satisfactorily responded to our comments of a previous review (1 May 1981) by submitting revised protocols designed to correct the acknowledged deficiencies. While not included in the protocols, analytical methodologies will be required when the data are submitted.

Herbert L. Manning
Herbert L. Manning, Ph.D.
Review Section #1
EFB/HED



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

① Copy to LARVIN DEFICIENT TESTING 6/17/81
② File - Larvin Chemistry

JUN 8 1981

RECEIVED
JUN 11 1981
J. S. LOVELL

Mr. Steve Lovell
Union Carbide Corporation
Agricultural Products Company
7825 Baymeadows Way
Jacksonville, FL 32216

Dear Mr. Lovell:

Subject: Larvin 500 Thiodicarb Insecticide
Larvin Thiodicarb Insecticide 75 WP
EPA File Symbol 264-GUR and 264-GUE
Thiodicarb for use on Cottonseed and Soybeans
Your submission of September 8, 1980

We have completed our general (product) chemistry and environmental fate review of the subject applications for registration. The following comments pertain to those reviews.

General (Product) Chemistry

[REDACTED]

Environmental Fate

1. The following information was not submitted and is needed to complete our evaluation of the field dissipation study.
 - a. Estimates of half-life and dissipation rate in field soil.
 - b. Description of soil residue analytical methodology.
 - c. Test soil characteristics, location and plot size.
2. Conclusive data on the effect of thiodicarb on aerobic nitrogen fixation are needed. From the data submitted showing varying effects on nitrogen fixing organisms and control samples which showed low or undetectable nitrogen fixation, we have been unable to determine whether the effect of thiodicarb on nitrogen fixing organisms is temporary or long standing.
3. Based on the crop rotation data submitted with these applications for registration, the following rotational restriction should be added to the label.

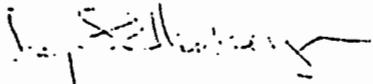
INERT INGREDIENT INFORMATION IS NOT INCLUDED

15

Corn (and soybeans) may be planted 4 months after the last application. Leafy vegetables may be planted 12 months after the last application.

If you have any questions concerning this letter, please contact me at (703) 557-7024.

Sincerely,


Jay S. Ellenberger
Product Manager (12)
Insecticide-Rodenticide Branch
Registration Division (TS-767C)

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Ecological Effects review of thiodicarb

Page _____ is not included in this copy.

Pages 3 through 4 are not included in this copy.

The material not included contains the following type of information:

- Identity of product inert ingredients
 - Identity of product impurities
 - Description of the product manufacturing process
 - Description of product quality control procedures
 - Identity of the source of product ingredients
 - Sales or other commercial/financial information
 - A draft product label
 - The product confidential statement of formula
 - Information about a pending registration action
 - FIFRA registration data
 - The document is a duplicate of page(s) _____
 - The document is not responsive to the request
-

The information not included is generally considered confidential by product registrants. If you have any questions, please contact the individual who prepared the response to your request.

Ecological Effects review of thiodicarb

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Pages 5 through 10 are not included in this copy.

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Ecological Effects review of thiodicarb

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Pages 11 through 16 are not included in this copy.

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