

RECORD NO.

125401
SHAUGHNESSEY NO.

REVIEW NO.

EEB REVIEW

DATE: IN 4-18-86 OUT 27 MAY 1986

FILE OR REG. NO 279-3053, 279-3054

PETITION OR EXP. NO.

DATE OF SUBMISSION 4-04-86

DATE RECEIVED BY HED 4-10-86

RD REQUESTED COMPLETION DATE 6-30-86

EEB ESTIMATED COMPLETION DATE 6-23-86

RD ACTION CODE/TYPE OF REVIEW 360/106

TYPE PRODUCT(S) : I, D, H, F, N, R, S Herbicide

DATA ACCESSION NO(S).

PRODUCT MANAGER NO. R. Taylor (25)

PRODUCT NAME(S) Command 4EC: 279-3053

Command 6EC: 279-3054

COMPANY NAME FMC Corporation

SUBMISSION PURPOSE Submission of data (complications)
concerning sheepshead minnow study

SHAUGHNESSEY NO.

CHEMICAL, & FORMULATION

% A.I.

125401

2-(2-chlorophenyl)-methyl-4-4

dimethyl-3-isoxazolidinone

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27 MAY 1986

MEMORANDUM

SUBJECT: Command herbicide - notification of complications in sheepshead minnow study

FROM: Allen W. Vaughan, Entomologist
Ecological Effects Branch
Hazard Evaluation Division (TS-769-C)

THRU: Norman J. Cook, Head-Section 2
Ecological Effects Branch
Hazard Evaluation Division (TS-769-C)

THRU: Michael W. Slimak, Chief
Ecological Effects Branch
Hazard Evaluation Division (TS-769-C)

TO: Robert J. Taylor, PMT-25
~~Herbicide/Fungicide Branch~~
Registration Division (TS-767-C)

EEB has reviewed the material submitted by FMC concerning problems with a sheepshead minnow acute LC₅₀ study. As noted in the letter from FMC and in the attached memo, this matter was resolved through discussion between Norm Cook (EEB) and Eunice Cuirle of FMC. EEB anticipates no further action on this matter until receipt of the final report on the study.

Attachment

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

04 APR 1986

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Command Herbicide: Sheepshead Minnow Study

FROM: Norman Cook, Head *Norman Cook*
Section #2, EEB

TO: Command File

On 3-26-86, I talked to Eunice Curle, the FMC representative for Command herbicide. Our discussion concerned the sheepshead minnow study being performed to satisfy a conditional data requirement for Command. She wanted to know whether FMC should redo the study, rather than submit it, because there was a substantial drop in measured concentrations at 72-hours. However, there was no change in mortality patterns throughout the study. A summary of what occurred is below:

Nominal Concentration Levels	% Mortality			
	24-hr	48-hr	72-hr	96-hr
4.7 ppm	0	0	0	0
9.4 ppm	0	0	0	0
18.8 ppm	0	0	0	0
37.5 ppm	0	0	0	0
75.0 ppm	100	100	100	100
Measured Concentration as % of Nominal Concentration	90-95%	78%	31-37%	75-81%

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Ms. Curle indicated that FMC and the laboratory weren't sure why the drop in concentration levels occurred. FMC assumed that there was some effect occurring between Command and seawater. I told Ms. Curle that based upon what she gave me (see summary above), I was not overly concerned -- primarily, because the level at which mortality occurred was relatively high (75 ppm) and concentrations were measured throughout the study. I indicated she should finalize the study and submit it for review. I also told her that Jim Akerman would be calling her to request that FMC send a letter to the Agency describing what had happened during the study.

cc: M. Slimak
A. Vaughan