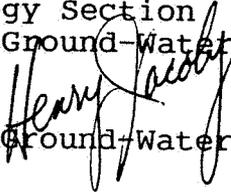


Shaughnessy Number: 125401

Date Out of EFGWB: 3/29/90

TO: R. Cool/L. Pemberton
Product Manager 41
Registration Division (H7505C)

FROM: Michael Barrett, Section Head (Acting) 
Ground-Water Technology Section
Environmental Fate & Ground-Water Branch/EFED (H7507C)

THRU: Henry Jacoby, Chief 
Environmental Fate & Ground-Water Branch/EFED (H7507C)

Attached, please find the EFGWB review of:

Reg./File #: 90-DE-02

Chemical Name: Dimethazone

Type Product: Herbicide

Company Name: FMC Corporation

Purpose: Review of application for specific exemption under FIFRA Section 18 for use on cucumbers in Delaware.

Date Received: 3/5/90 ACTION CODE: 510

Date Completed: 3/20/90 EFGWB #(s): 90-0419

Monitoring study requested: Total Review Time: 1 day

Monitoring study voluntarily:

- Deferrals To: Biological Effects Branch
 Science Integration & Policy Staff, EFED
 Non-Dietary Exposure Branch, HED
 Dietary Exposure Branch, HED
 Toxicology Branch, HED

*** 952*



Data Review Record

Confidential Business Information - Does not contain National Security Information (E.O. 12065)

50200

EFED

3-5-90

1. Product Name Command Chemical Name Chomazone

2. Identifying Number	3. Record Number	4. Action Code	5. MRID/ Accession Number	6. Study Guideline or Narrative
90-DE-02	259991	510		

7. Reference No. 8. Date Rec'd (EPA) 2/15/90 9. Prod/Review Mgr/DCI Cook/Pembraton 10. PM/RM Team No. 41 11. Date to HED/EFED/RD/BEAD 3/2/90 12. Proj Return Date 3/17/90 13. Date Returned to RD/SRRD

Instructions
Please comment on groundwater concerns.

This Section Applies to Review of Studies Only

14. Check Applicable Box

<input type="checkbox"/> Adverse 6(a)(2) Data (405)	<input type="checkbox"/> Generic Data (Reregistration) (660)	15. No. of Individual Studies Submitted
<input type="checkbox"/> Special Review Data (870)	<input type="checkbox"/> Product Specific Data (Reregistration) (655)	

16. Have any of the above studies (in whole or in part) been previously submitted for review?
 Yes (Please identify the study(ies)) No

17. Related Actions

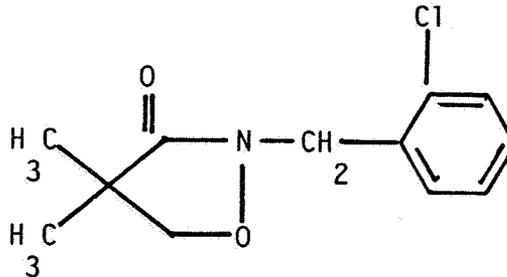
18.	To	Type of Review	19. Reviews Also Sent to	20. Data Review Criteria
HED		Science Analysis & Coordination	<input type="checkbox"/> SAC <input type="checkbox"/> PC	A. Policy Note No. 31 <input type="checkbox"/> 1 = data which meet 6(a)(2) or meet 3(c)(2)(B) flagging criteria <input type="checkbox"/> 2 = data of particular concern from registration standard <input type="checkbox"/> 3 = data necessary to determine tiered testing requirements B. Section 18 <input type="checkbox"/> 1 = data in support of section 3 in lieu of section 18 C. Inert Ingredients <input type="checkbox"/> 1 = data in support of continued use of List 1 inert
		Toxicology/HFA	<input type="checkbox"/> TOX/HFA <input type="checkbox"/> PL	
		Toxicology/IR	<input type="checkbox"/> TOX/IR	
		Dietary Exposure	<input type="checkbox"/> DEB <input checked="" type="checkbox"/> EA	
	Nondietary Exposure	<input type="checkbox"/> NDE <input checked="" type="checkbox"/> AC		
EFED	<input checked="" type="checkbox"/>	Ecological Effects	<input checked="" type="checkbox"/> EEB <input checked="" type="checkbox"/> BA	
		Environmental Fate & Groundwater	<input checked="" type="checkbox"/> EFGWB	
SRRD		Special Review	<input type="checkbox"/> SR	
		Reregistration	<input type="checkbox"/> RER	
		Generic Chemical Support	<input type="checkbox"/> GSC	
RD		Insecticide-Rodenticide	<input type="checkbox"/> IR	
		Fungicide-Herbicide	<input type="checkbox"/> FH	
		Antimicrobial	<input type="checkbox"/> AM	
		Product Chemistry		
BEAD		Precautionary Labeling		
		Economic Analysis		
		Analytical Chemistry		
		Biological Analysis		

Confidential Statement of Formula (EPA Form 8570-4) Attached (Trade Secrets) Label Attached

APPLICATION FOR EXEMPTION UNDER
FIFRA SECTION 18

1. CHEMICAL:

Chemical name: 2-(2-chlorophenyl)-methyl-4,4-dimethyl-3-isoxazolidinone
Common name: Dimethazone (FMC 57020)
Structure:



2. TEST MATERIAL:

Not Applicable.

3. STUDY/ACTION TYPE:

Review of application for specific exemption in accordance with FIFRA Section 18.

4. STUDY IDENTIFICATION:

Submitted by: H. Grier Stayton, Pesticide Compliance Supervisor
State of Delaware
Department of Agriculture
Division of Consumer Protection
2320 South DuPont Highway
Dover, DE 19901

Identifying No.: 90-DE-02
Action Code: 510
Record Number: 259,991
Date Sent to EFED: 3/2/90

5. REVIEWED BY:

W. Martin Williams
Hydrologist
OPP/EFED/EFGBW/Ground-Water Technology Section

Signature: W. Martin Williams

Date: 3/20/90

6. APPROVED BY:

Michael R. Barrett
Section Head (Acting)
OPP/EFED/EFGBW/Ground-Water Technology Section

Signature: Michael R. Barrett

Date: 3/26/90

7. CONCLUSIONS:

Dimethazone is both mobile and persistent in soil and water. Environmental fate properties are not unlike those of atrazine in soil and water. Atrazine has been shown to leach to ground water at low concentrations as a result of normal field

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use (typically less than 1 ppb). In hydrogeologically sensitive areas, atrazine concentrations have been detected at levels up to 40 ppb. Because application rates for dimethazone in this request (0.3 to 0.5 lb ai/A) are lower than typical application rates for atrazine (2 to 4 lb ai/A), it is unlikely that dimethazone will leach to ground water at the same levels as atrazine from this Section 18.

8. RECOMMENDATIONS:

EFGWB does not object to this Section 18 on the basis of ground water concerns with the recommendation that dimethazone not be used in areas having very permeable (sandy) soils, ground water less than 30 feet, and/or soil conditions conducive to preferential flow (e.g., karst terrane).

Please contact Toxicology Branch, HED for toxicological implications of ppb levels of dimethazone in ground water.

9. BACKGROUND:

The applicant requests the use of Command 4EC at a rate of 0.3 to 0.5 lb ai/A once per year to control broadleaf weeds on cucumbers. Up to 2000 acres would be treated with a single application (either preemergent or preplant incorporated) from May 20, 1990 to August 30, 1990. The ineffectiveness of alternative methods of control are discussed in the application. The total quantity of active ingredient required is 3000 lb.

10. DISCUSSION:

Table 1 compares soil and chemical attributes for dimethazone (USEPA 1985) to criteria used to assess leaching potential (Cohen et al. 1984). Table 1 illustrates that dimethazone is both mobile and persistent in the environment.

The leaching potential of dimethazone is compared to 13 high volume use pesticides in Table 2. The Retardation and Attenuation Factors in Table 2 were obtained using the interactive computer program CHEMRANK (Nofziger et al. 1988). The Retardation Factor is an index of mobility and is a function of the bulk density, organic carbon content, field capacity, and porosity of the soil as well as of the organic carbon-water partition coefficient and Henry's Law constant of the pesticide. The Attenuation Factor reflects the proportion of the applied compound that will reach a defined control depth in the soil and is based on the Retardation Factor, decay rate (soil degradation half-life), and recharge rate.

Pesticide mobility in an idealized sandy clay loam soil (20% clay, 20% silt, and 60% sand) was simulated with CHEMRANK to derive the results in Table 2. A control depth of 1.0 meter and overly conservative (intense) recharge rate of 10 mm/day were used in the model to calculate the Attenuation Factor. Two soil horizons were defined, with the first horizon being between 0.0 and 0.15 m, and the second horizon between 0.15 and 1.0 m. Respective characteristics of these two horizons were: organic carbon contents of 1.2 and 0.4% and bulk densities of 1.4 and 1.5 gram/cc. Both horizons were defined as having a field capacity of 20% and a porosity of 45% (by volume). A detailed discussion of Table 2 is presented by Barrett and Williams (1989).

Dimethazone is ranked in Table 2 according to leaching potential as defined by the Attenuation Factor. Dimethazone is ranked below carbofuran (a very mobile chemical based on its low organic carbon-water partition coefficient) but above simazine,

2,4-D, and atrazine. 2,4-D is very mobile but relatively nonpersistent. Atrazine and simazine are both mobile and persistent. Mobility and persistence as reflected by the organic carbon-water partition coefficients and soil half-lives, respectively, are similar for dimethazone, atrazine, and simazine.

EPA has no record of ground-water monitoring for dimethazone. Ground-water monitoring data for chemicals having similar environmental fate characteristics can be used to estimate maximum potential concentrations from the use of dimethazone. Carbofuran, simazine, 2,4-D, and atrazine have been detected in various studies in ground water as a result of normal field use (Williams et al. 1988). Concentrations have been reported as high as 176 ppb for carbofuran, 9.1 ppb for simazine, 49.5 ppb for 2,4-D, and 40 ppb for atrazine. Extensive monitoring has occurred for atrazine - more than the other pesticides. Except in conditions of very high hydrogeologic vulnerability (e.g., permeable soils, ground water less than 30 feet, and/or karst terrain), most atrazine concentrations in ground water associated with normal agricultural use fall in the sub-part per billions range (Barrett and Williams, 1989).

Table 2 illustrates that application rates for dimethazone are generally less than those of atrazine by a factor of 2 to 8. Application rates for this Section 18 are 0.2 to 0.5 lb ai/A compared to typical application rates of 2 to 4 lb ai/A for atrazine. Based on the lower application rates and similar environmental fate behavior, is unlikely that dimethazone will result in higher concentrations in ground water than atrazine.

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REFERENCES

- Barrett, M.R. and W.M. Williams, "The Occurrence of Atrazine in Ground Water as a Result of Agricultural Use", presented at the Conference on Pesticides in Terrestrial and Aquatic Environments, sponsored by the Virginia Water Resources Research Center, Virginia Polytechnic Institute, May 18-22, 1989 in Richmond Virginia.
- Cohen, S.Z., S.M. Creeger, R.F. Carsel, and C.G. Enfiel, "Potential Pesticide Contamination of Groundwater from Agricultural Uses, in Treatment and Disposal of Pesticide Wastes", ACS Symposium Series #259, R.F. Krueger and J.N. Seiber, ed., American Chemical Society, Washington, D.C., 1984.
- Nofziger, D.L., P.S.C. Rao, and A.G. Hornsby, "CHEMRANK: Interactive Software for Ranking the Potential of Organic Chemicals to Contaminate Groundwater", University of Florida, Gainesville, 1988.
- U.S. Environmental Protection Agency, "Exposure Assessment Branch One Liner, EAB File No: 125401", unpublished chemical property summary on Dimethazone prepared by the Hazard Evaluation Division, Exposure Assessment Branch, Aug. 13, 1985.
- U.S. Environmental Protection Agency, "RfD Tracking Report", unpublished, prepared by Office of Pesticide Programs, Health Effects Division, February 22, 1990.
- Williams, W. M., P.W. Holden, D.W. Parsons, and M.N. Lorber, "Pesticides in Ground Water Data Base: 1988 Interim Report", U.S. Environmental Protection Agency, Office of Pesticide Programs, December 1988.

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TABLE 1.
LEACHING ASSESSMENT FOR DIMETHAZONE

PROPERTY	RANGES	CRITERIA	ASSESSMENT
ABSORPTION PARTITION COEFF.	1.54 - 6.85	<5.0, <1.0 OR 2.0	MODERATE TO SIGNIFICANT
SOLUBILITY	1110 PPM	>30 PPM	SIGNIFICANT
HYDROLYSIS HALF-LIFE	STABLE	>25 WEEKS	SIGNIFICANT
PHOTOLYSIS HALF-LIFE	SOIL - STABLE WATER - 88 DAYS	>1 WEEK	SIGNIFICANT
AEREBIC SOIL HALF-LIFE	28 - 173 DAYS	>2-3 WEEKS	SIGNIFICANT
HENRY'S LAW CONSTANT	4.07 E-8 ATM-M3/MOL	<1.0 E-2 ATM-M3/MOL	SIGNIFICANT

OVERALL ASSESSMENT: DIMETHAZONE IS BOTH MOBILE AND PERSISTENT

COMPUTATION OF HENRY'S LAW CONSTANT:

$$KH = CS / P$$

$$P = \text{VAPOR PRESSURE} = 1.44 \text{ E-4 TORR} = 1.895\text{E-7 ATM}$$

$$CS = \text{SOLUBILITY} = 1110.0 \text{ PPM} = .00111 \text{ GM/M3}$$

$$= .00111 \text{ GM/M3} \times (1 \text{ MOLE}/239.7 \text{ GM}) = 4.631 \text{ MOLE/M3}$$

$$KH = (CS/P) = 4.631 / 1.895\text{E-7} = 2.444 \text{ E 7 MOL/(M3-ATM)}$$

$$1/KH = 4.092 \text{ E-8 (M3-ATM/MOL)}$$

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Table 1. Environmental Chemistry Characteristics and Leaching Potential Ranking of Some Commonly Used Pesticides

Rank	Common Name	Use ¹	Health Standard ² (ppb)	Typical Application Rate (lb./acre)	Henry's Law Constant (atm-m ³ /mol)	Organic Carbon Water Partition Coefficient (ml/g O.C.)	Retardation Factor	Degradation Half-Life (days)	Attenuation Factor
1	Carbofuran	I	40	0.90	8.10 E-09	25.5	2.0	42	5.2 E-01
2	Simazine	H	4	2.00 - 4.00	3.68 E-10	144.0	6.5	75	3.0 E-01
3	2,4-D	H	70	0.25 - 2.00	3.17 E-02	33.0	2.3	16	1.4 E-01
4	Atrazine	H	3	2.00 - 4.00	3.20 E-09	160.0	7.1	60	1.3 E-01
5	Metribuzin	H	200	0.25 - 1.00	2.33 E-10	95.0	4.6	30	1.2 E-01
6	Cyanazine	H	10	1.00 - 4.00	3.17 E-12	168.0	7.4	20	5.9 E-03
7	Metolachlor	H	100	1.50 - 3.00	9.16 E-09	200.0	8.6	20	2.5 E-03
8	Alachlor	H	2	1.50 - 4.00	3.24 E-08	190.0	8.2	14	2.9 E-04
9	Carbaryl	I	700	1.50	1.85 E-05	229.0	9.7	7	4.3 E-09
10	Butylate	H	350	3.00 - 6.00	8.26 E-06	540.0	22.0	12	1.5 E-11
11	Malathion	I	--	0.90	1.20 E-07	1790.0	69.0	1	0.0 E-00
12	Methyl parathion	I	2	0.50	6.12 E-07	7330.0	280.0	4	0.0 E-00
13	Trifluralin	H	2	0.50 - 1.00	1.62 E-04	9850.0	3830.0	70	0.0 E-00

¹ (H)erbicide, (I)nsecticide

² Drinking water Maximum Contaminant Level or Lifetime Health Advisory level (USEPA 1989)

DIMETHAZONE H 300 0.4-1.5 4.13 x 10⁻⁹ 100.0 3.2 95 3.9 E-01

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