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To: Robert Taylor				
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From: Samuel Creeger, Chief	UPL			
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Chemical Name: Paclobutrazol				
Type Product: Growth Regulator			Language yeye de karaktar Kerdan	
Product Name : Clipper 2SC and				
Company Name : ICI Americas				
				:
Purpose : Protocol: PP333 -	- Dissipation	and Leachir	g Following	g Sub-
Surface Applicati	ions in Orcha	rd Soils		
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1. CHEMICAL:

Paclobutrazol (±)-(R*,R*)-beta-[(4-chlorophenyl)methyl]-alpha-(1,1-dimethylethyl)-lH-1,2,4-triazole-1-ethanol

2. TEST MATERIAL:

Formulated product of either Clipper 2 SC or (no other details supplied by RD)

3. STUDY/ACTION TYPE:

Review of Protocol

4. STUDY IDENTIFICATION:

PP333: Dissipation and Leaching Following Sub-surface Applications in Orchard Soils

5. REVIEWED BY:

Emil Regelman Chemist EAB/HED/OPP Signature

Date: 5/30/85

6. APPROVED BY:

Samuel Creeger Chief Review Section #1 EAB/HED/OPP Signature:

Date: MAY 30 1980

7. CONCLUSIONS:

The submitted protocol should be modified as follows:

- 7.1 Soil samples should be taken to a sufficient depth to adequately define the extent of leaching; the intended 12 inch limit may not be adequate.
- Sampling during the first month should be more frequent, despite the 9 week half life reported in the macrobic soil metabolism study. The rate of degradation under field conditions may be significantly different from that observed in the laboratory.

- 7.3 If rainfall is inadequate during the experimental period, supplemental irrigation will be necessary; total rainfall + irrigation should approximate the heaviest 5-year yearly rainfall.
- 7.4 Soils from each of the 10 sample boxes should not be combined, about should be analyzed separately.
- 7.5 At each sampling interval (except at time zero); soil samples should be taken at depths greater than the proposed 6 inches.
- 7.6 A storage stability study must be submitted which confirms the stability of soil residues during the storage phase of the proposed study.
- 7.7 Assuming adoption of the above recommendations, the proposed course of study will be acceptable to EAB.
- 7.8 we cannot comment on the adequacy of the undescribed, alternative soil sampling method moted in section 6.6b of the protocol.

8. RECOMMENDATIONS:

RD should submit a copy of the later label for EAB's records.

9. BACKGROUND:

A. Introduction

Pursuant to their meeting with FAB on \$11/8/84, ICT Americas has submitted a study protocol for FAB concurrence. A copy of that protocol is appended to this review.

According to the review of 3/15/84, paclobutrazol is refractory to both hydrolysis and aqueous photolysis, but degrades in soil under aerobic conditions with halflives ranging from 9.1 to 30.5 weeks, depending on soil organic content. The only major degradate is the paclobutrazol keto analog, which will be quantitated during the proposed experiment. Paclobutrazole was found to leach at a moderate rate (2 on the Helling scale of 1 to 5), especially in soils of low organic content.

10. DISCUSSION OF INDIVIDUAL TESTS OR STUDIES:

A. Study Identification

See \$ 4, above.

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- **B. ** Materials and Methods (Protocols)
- Reported Results
- D. Study Author's Conclusions/Quality Assurance Measures
- E. Reviewer's Discussion and Interpretation of Study Results

See conclusions in section 7.

11. COMPLETION OF ONE-LINER:

No additional data have been added to the longoing one-line data

12. CBI APPENDIX:

The study protocol, appended to this review, may be considered to be CBI, and should be treated as such.

Paclobutrazol scientific review
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Pages 5 through 16 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
X FIFRA registration data
The document is a duplicate of page(s)
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(4) P.C.