DP Barcode :D176733, D176734, D176735, D178286, D178288, D178289
PC Code No. :128834
EFGWB Out : 29 JUN 1992

TO: Cynthia Giles-Parker
Product Manager PM #22
Registration Division (H7505C)

FROM: Paul J. Mastradone, Ph.D., Chief
Environmental Chemistry Review Section #1
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 # :42545-LO, 42545-LE, 42545-LG, 8F3603

Common Name :Pyridate

Product Name :Tough

Company Name :Agrolinz, Inc.

Purpose :Review of photodegradation in water and soil, anaerobic metabolism and field dissipation studies, freezer storage stability and environmental fate summary.

Type Product :Herbicide Action Code: 101 EFGWB #(s): 92-0745, 92-0746, 92-0747, 92-0877, 92-0878, 92-0879

Review Time :30.0 days

EFGWB Guideline/MRID/Status Summary Table: The review in this package contains...

161-1			162-4			164-4			166-1		
161-2	42264001/42242801	Y	163-1			164-5			166-2		
161-3	42264002	Y	163-2			165-1			166-3		
161-4			163-3			165-2			167-1		
162-1			164-1	42242803/42242804	Y	165-3			167-2		
162-2	42242802	N	164-1	42242805/42242806	Y	165-4			201-1		
162-3			164-1	42296801	Y	165-5			202-1		

Y = Acceptable (Study satisfied the Guideline)/Concur P = Partial (Study partially satisfied the Guideline, but additional information is still needed)
S = Supplemental (Study provided useful information, but Guideline was not satisfied) N = Unacceptable (Study was rejected)/Non-Concur

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

OFFICE OF
PESTICIDES AND TOXIC
SUBSTANCES

July 6, 1992

MEMORANDUM

SUBJECT: Pyridate
Re: Small-Scale Prospective Ground-Water Monitoring Study

FROM: Henry Jacoby, Chief
Environmental Fate and Ground Water Branch
Environmental Fate and Effects Division (H7507C)

TO: Frank Sanders, Chief
Fungicide-Herbicide Branch
Registration Division (H7505C)

In my staff's evaluation of the fate and transport of pyridate, there is the finding that due to its rapid degradation pyridate, per se, should not contaminate ground water. Our evaluation also indicates that only in extraordinary circumstances is it likely that the major degradate would leach into ground water. However, the major degradate has the properties and characteristics associated with known ground-water contaminants and has demonstrated its potential to leach into ground water (unconfirmed detection in ground water in Europe). These conditions would lead EFGWB to request the small-scale prospective ground-water monitoring study.

The small-scale prospective monitoring study would develop the information that are needed to address issues of concern. These issues include:

- is the degradation of CL-9673 temperature dependent (i.e., is this why no detections were seen in NC and CA despite the permeable soils and low organic matter), and

- is it possible that in Illinois, where the rainfall was extreme, detections were minimal because the excessive precipitation flushed the chemical either to ground water or into surface runoff?

The small-scale study should give more empirical data on the CL-9673's movement through

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the soil profile. If CL-9673 does leach, the study would also obtain field information that would allow the Branch to better utilize modeling in estimating whether the compound could leach in other vulnerable soils. Although a small-scale monitoring study in the vulnerable site is the normal progression of data, the Branch recognizes that there may be little or no concern about the toxicity hazards of CL-9673. Therefore, the Branch recommends that FHB review the hazards associated with CL-9673 to determine if it is worthwhile, from a regulatory standpoint, to pursue additional information on the degradate.