



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

Sam Creeger

128850

MAR 7 1985

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Classification of HOE 039866

TO: Robert Ikeda, Team 23
Registration Division (TS-767)

This is in response to your request of 2/27/85 for HED to classify HOE 039866 as a biochemical or conventional pesticide.

HED has reviewed the information you provided and concluded that HOE 039866 is a conventional chemical pesticide. This conclusion is based on the following rationale:

(1) The mode of action does not fit the criterion for biochemicals: "other than direct toxicity in the target pest (e.g., growth regulation, mating disruption, attraction)". The stated mode of action is enzyme inhibition (glutamine synthetase). There are many conventional chemical pesticides with enzyme inhibition as their mode of action; this is considered a directly toxic mode of action.

(2) HOE 039866 is a synthetic product rather than a fermentation product, thus it is a mixture of isomers whereas the natural product would be a single isomer. This alone would not necessarily prevent classification as a biochemical, but it does demonstrate that HOE 039866 is not identical to the natural product.

Even if HOE 039866 were classified as a biochemical, it is likely that tier II and possibly tier III testing would be required since application rates are fairly high (1-2 lbs ai/A) and expo-

sure to humans and other non-target organisms would probably be similar to that resulting from conventional chemical herbicides.

Frederick S. Betz

Frederick S. Betz, Biologist
Science Integration Staff (TS-769C)

cc: Jim Akerman
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