

Shaughnessy #: 128857

Date out of EAB: SEP 11 1985

Signature: *SM*

To: H. Jacoby  
Product Manager # 21  
Registration Division (TS-767)

From: Emil Regelman, Acting Chief  
Registration Standards, Section #3  
Exposure Assessment Branch  
Hazard Evaluation Division (TS-769)

*aqueous photolysis  
in pond water  
soil dissipation*

Attached please find the EAB review of:

Reg./File No.: 707-EUP-RNL

Chemical: Systhane

Type Product: Fungicide

Product Name: RH-3866

Company Name: Rohm and Haas

Submission Purpose: EUP for use on grapes, apples and turf  
grain

Action Code: 242

Date In: 6/10/85

EAB # 5663

Date Completed: SEP 11 1985

TAIS (level II)            Days

Deferrals To:

52

3

           Ecological Effects Branch

           Residue Chemistry Branch

           Toxicology Branch

1. CHEMICAL: RH-3866 (Systhane)  
butyl-[4-chlorophenyl-1-H-1,2,4-triazole-1-  
propanenitrile
2. TEST MATERIAL: 40% W.P.
3. STUDY/ACTION TYPE: EUP (fungicide) on apples, grapes and  
turf grass.
4. STUDY IDENTIFICATION: Accession #256773

Study 1


Ackermann, Dec. 1984. Aqueous photolysis of RH-3866.  
Technical Report No. 310-84-33. Rohm and Haas Co.  
Philadelphia, PA Acc. No. 256773. Reference 3.

Study 2

Deakyne, R.O. and C.K. Brackett. Nov. 1984. Analytical  
report on the decline of RH-3866 residues in soil. Rohm  
and Haas Co., Philadelphia, PA Acc. No. 256773. Reference 7.

5. REVIEWED BY:

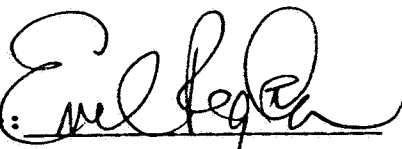
John Jordan  
Microbiologist  
EAB/HED/OPP

Signature: 

Date: 9/30/85

6. APPROVED BY:

Emil Regelman  
Acting Chief  
Review Section #3,  
EAB/HED/OPP

Signature: 

Date: OCT 1 1985

7. CONCLUSIONS:

Aqueous photolysis

The study does not fulfill the data requirements. The  
primary EAB objection to the study is the lack of an appropriate  
buffered distilled or deionized water test solution. Pond  
water was, (a) not buffered, (b) contaminants may have interfered  
with chemical analyses, (c) pond water may have contained

sensitization contaminants or, (d) contaminants may have influenced the adsorption of the light source. A study using a standardized test solution is required.

Please refer to the Dynamac conclusion (Study 1, p.5) for further deficiencies.

#### Field Dissipation

This study does not satisfy the data requirement, but it provides information on the dissipation of the parent compound. However, degradates were not identified or quantified. The analytical method was not provided, and, therefore, conclusions pertinent to the study are tentative. Other deficiencies are detailed in the conclusion on p. 8 (study number 2) of the Dynamac report.

#### 8. RECOMMENDATIONS:

##### Aqueous Photolysis

Photolysis rate determination and photoproduct identification experiments must be carried out using distilled or deionized water instead of pond water. Deficiencies are detailed in the conclusion on p. 5 of the Dynamac report.

##### Field Dissipation

Dissipation of parent compound was addressed but degradates were not identified or quantified. Degradates must be identified and quantified. The analytical method was not submitted, therefore, conclusions regarding the study are tentative pending receipt of the method. Deficiencies are reported in the conclusion on page 8 of the Dynamac review.

#### 9. BACKGROUND:

Please refer to the Dynamac Introduction on p. 1.

10. DISCUSSION OF INDIVIDUAL TESTS OR STUDIES: Please refer to pages 2 through 8 of Dynamac's Tasks I and II September 18, 1985 final report.

11. COMPLETION OF ONE-LINER: One liner has not been completed to date.
12. CBI APPENDIX: Data are claimed to be CBI by the registrant and are to be treated as such.

Response to Additional Data and Comments

In response to a 3/19/85 Dynamac review of RH 3866, the registrant requested clarification of ten points on 5/15/85. Below is a summary of the resolution (status) of the ten points.

Resolved/Unresolved Issues

- 1) Mobility of metabolites - Aged leaching data gap
- 2) Resolved -- percent recovery values
- 3) Adsorption/desorption data gap
- 4) Temperatures for laboratory hydrolysis, aerobic soil metabolism, and anaerobic soil metabolism studies are required.
- 5) Resolved -- leaching of samples discrepancy
- 6) Mobility of parent data gap
- 7) Resolved -- effects of air drying on test results
- 8) Resolved -- recovery values
- 9) Confined accumulation data gap
- 10) Resolved -- fish bioaccumulation data not required.