

208404, 208405, 208406
RECORD NO.

128857
SHAUGHNESSEY NO

90
REVIEW NO.

EEB REVIEW

DATE: IN 12-3-87 OUT 12-31-87

FILE OR REG. NO. 707-ERE 707-ERN 707-ERR

PETITION OR EXP. NO. _____

DATE OF SUBMISSION 11-12-87

DATE RECEIVED BY HED 12-1-87

RD REQUESTED COMPLETION DATE 12-31-87

EEB ESTIMATED COMPLETION DATE 12-31-87

RD ACTION CODE/TYPE OF REVIEW 111

TYPE PRODUCT(S) Fungicide

DATA ACCESSION NO(S) 404092

PRODUCT MANAGER, NO. L. Rossi (21)

PRODUCT NAME(S) Rally (Myclobutanil, Systhane, RH-3866)

COMPANY NAME Rohm and Haas Company

SUBMISSION PURPOSE Registrant Response to Previous Review

of Early Life-Stage Study with Fathead

Minnow

SHAUGHNESSEY NO.	CHEMICAL	% A.I.
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_____	<u>Myclobutanil</u>	_____
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

MEMORANDUM

December 31, 1987

SUBJECT: Registrant Response to Previous EEB Review of Early Life-Stage with Fathead Minnow, Record Nos: 208404, 208405, 208406

FROM: Daniel Rieder, Wildlife Biologist
Ecological Effects Branch
Hazard Evaluation Division

THRU: Norman J. Cook, Head, Section 2
Ecological Effects Branch
Hazard Evaluation Division

THRU: Henry T. Craven, Acting Chief
Ecological Effects Branch
Hazard Evaluation Division TS-769C

TO: Lois Rossi PM(21)
Insecticide/Fungicide Branch
Registration Division TS-767C

The registrant, Rohm and Haas Company has submitted additional information on the fish early life stage test previously reviewed by EEB, see review dated July 31, 1987. In that review, EEB indicated that additional information was necessary before the test evaluation could be completed. The test was categorized as supplemental because of the missing information. All but one of the noted deficiencies have been adequately addressed, see attached excerpt from the submission in which ABC Laboratories satisfactorily addresses each protocol question. The deficiency which the registrant failed to address was the submission of all required raw data. In the final response (Page 8 of 72, attached excerpt) it indicates that raw mortality data are provided on pages 38 to 45. In the copies of raw data provided with the submission, the registrant provided pages 38, 39, and 45, omitting pages 40, 41, 42, 43, and 44. The EEB notes that other raw data previously required have been provided including:

CONCURRENCES

SYMBOL	TS-769C	TS-769	TS-769C				
SURNAME	<i>Lois</i>	<i>Vaughan for Cook</i>	<i>Craven</i>				
DATE	12-28-87	12-28-87	12-30-87				

1. number of embryos hatched;
2. time to hatch; and
3. measurement of length and weight.

Conclusion

When the required mortality data for days 11 through 26 of the study have been provided, EEB will complete its reevaluation of the study.

Page _____ is not included in this copy.

Pages 4 through 8 are not included.

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 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.
 - ☒ FIFRA registration data.
 - ____ The document is a duplicate of page(s) _____.
 - ____ The document is not responsive to the request.
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The information not included is generally considered confidential by product registrants. If you have any questions, please contact the individual who prepared the response to your request.
