

JUL 11 1988




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

MEMORANDUM

SUBJECT: GX-071

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

FROM: 
James W. Akerman, Chief
Ecological Effects Branch
Hazard Evaluation Division (TS-769C)

TO: Phillip Hutton, PM 17
Insecticide-Rodenticide Branch
Registration Division (TS-767C)

As per your request, EEB has reviewed the registrant's letter dated June 21, 1988 addressing the acute terrestrial and aquatic studies in a previous EEB review. After reviewing the registrant response, EEB has the following comments:

1. Bobwhite quail LC₅₀

This study can be upgraded to core status, providing the registrant accepts the LD₅₀ value as 380 mg/kg instead of 473.76 (357-2338) mg/kg.

2. Rainbow trout LC₅₀

This study remains supplemental and cannot be upgraded to core status for the following reasons:

- The test material was not in solution;
- The temperature was 17.5 -24 °C instead of 10-15 °C; and
- The test material was insoluble in water and the registrant was unable to produce a stable solution. Also the registrant did not mention the name of organic solvent used in the study.

EEB cannot determine the exact exposure concentration of GX-071 to rainbow trout because the test material was not in solution nor was the test solution analyzed for GX-071. The following organic solvents are acceptable for use in an aquatic study:

- Dimethyl formamide
- Triethylene glycol
- Methanol
- Acetone
- Ethanol

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3. Daphnia pulex LC₅₀

If the registrant submits the water analysis data, along with procedure used and they are found acceptable to support registration, then this study can be upgraded to core.

- Temperature was 24 °C instead of 17-21 °C;
- Test vessel volume was 1 oz instead of 200-300 ml; and
- Test vessel material type was plastic containers instead of glass or stainless steel.

Conclusions:

A. Adequacy of Data

1. The bobwhite quail acute oral LD₅₀ study does fulfill the requirement in support of registration.

B. Inadequacy of Data

1. The 96-hour LC₅₀ for rainbow trout does not fulfill the in support of registration.

C. Study Pending Additional Data

1. The 48-hour LC₅₀ for Daphnia pulex pending result of acceptable water analysis data.