NEW

Shaughnessy No.: -----
Date Out of EFGWB: MAY 31 1989

TO: L. Rossi/Lewis
Product Manager 21
Registration Division (TS-767)

FROM:

Paul Mastradone, Acting Section Chief
Environmental Chemistry Review Section #1
Environmental Fate and Groundwater Branch

THRU:

Henry Jacoby, Acting Chief
Environmental Fate and Groundwater Branch
Environmental Fate and Effects Division (TS-769C)

Attached please find the EFGWB review of:

Reg./File # : 707-EUP-RER

Chemical Name: RH-7592

Product Type : Fungicide

Product Name : -

Company Name : Rohm and Haas

Purpose : Review protocol for field dissipation study.

Date Received: 4/27/89 Action Code: 785

Date Completed: 5/19/89 EFGWB No. 90542

Total Reviewing Time (decimal days): 2.5

Deferrals to:
_____Ecological Effects Branch, EFED
_____Science Integration & Policy Staff, EFED
_____Non-Dietary Exposure Branch, HED
_____Dietary Exposure Branch
_____Toxicology Branch, HED

1.0 CHEMICAL:

Common name: RH-7592 2F Fungicide

Chemical name: 2-(2-chlorophenyl)ethyl-2-phenyl-3-(1H-1,2,4-triazole)-1-propanenitrile

Trade Name:

Chemical Structure:

2.0 TEST MATERIAL: 2F Fungicide (TEP)

3.0 STUDY/ACTION TYPE:

The registrant, Rohm and Haas Co., has requested review of their protocol for conducting the field dissipation study.

4.0 STUDY IDENTIFICATION:

Protocol No. 34P-89-15. Protocol for RH-7592 Field Dissipation Study.

5.0 REVIEWED BY:

Clinton Fletcher
Chemist, Review Section 1
EFGWB/EFED

Signature: Clinton Fletcher
Date: 5-19-89

6.0 APPROVED BY:

Paul J. Mastradone
Acting Chief, Review Section 1
EFGWB/EFED

Signature: Paul J Mastradone
Date: MAY 30 1989

7.0 CONCLUSIONS:

7.1 EDGWB concludes that, overall, the protocol is scientifically sound.

7.2 EFGWB has comments on the protocol given in RECOMMENDATIONS, 8.0, below.

8.0 RECOMMENDATIONS:

Inform the registrant of the following comments:

1. The test substance should be a product whose formulation is typical of the formulation category for which registration is sought.

2. A rain gauge should be installed at the test site to determine if supplemental irrigation will be needed as the study progresses.

3. Irrigation should supplement rainfall in a dry year. If the study is conducted during a dry year, irrigation should be used to supplement rainfall to provide the average of rainfall expected during any given month of the study as based on monthly averages for 10, 20 or 40 year rainfall data.

4. Soil samples should be taken at sufficient time intervals after treatment so that pesticide residues could be tracked with each sample interval. The sampling schedule, as described, may be too infrequent for half-life and leaching profile determinations. This is especially true between the 2 to 8 month period of the study.

For pesticides which are considered persistent and immobile, an appropriate sampling schedule would be monthly for six months near the beginning of the study, then bimonthly until twelve months and quarterly until termination of the study.

For a pesticide with a very short half-life (i.e., less than one week), then the sampling scheme may include samples on days 1,3, and 5, then sampling emphasis should be on the major degradates.

5. Soil samples should be taken immediately following each application. EDGWB notes that the protocol calls for up to 5 applications at 14 day intervals.

6. EFGWB considers sampling to the depth of 90 cm is sufficient to indicate leaching. EFGWB notes that the protocol calls for taking soil cores to a depth of 48 inches but representative 3 foot cores will be subdivided .

7. Soil cores should be sectioned at 15 cm increments for the total 90 cm core length. EFGWB notes that the protocol calls for sections at 12 inch increments.

8. The registrant states that the dissipation analyses will follow degradation to three whole molecule metabolites and triazole. Triazole is a terminal soil metabolite of myclobutanil whose dissipation under actual field conditions is well documented. Thus, no additional information will be generated on triazole.

The registrant should be informed that, in order to bridge the triazole data, all field and study conditions of these studies (e.g., application rate, test plot locations, climatic conditions and/or any other conditions which may effect the test data) will have to be similar. Also, the bridging data must have been favorably accepted by the Agency as being adequate to satisfy the data requirement for which it was submitted.

9. The study report should include (1) analytical method recoveries along with a description of the method used, (2) raw data from which field half-lives are calculated, and (3) correlation, if any, of rainfall patterns and/or major rainfall events with any residue movement.

9.0 BACKGROUND:

The registrant submitted a protocol for conducting the field dissipation study for their experimental chemical RH-7592 2F Fungicide. Basically, four geographically representative sites will be chosen. One in the Midwest, one in the southeast and two sites with different climatic conditions and soil compositions in California. Various rates will be applied. Each site will be replicated 3 times along with a control plot. Five soil cores will be taken to a depth of 4 feet on selected days from each replication, sectioned and composited to make one sample. A field spike sample will be included at the field site. (See the attached protocol for the complete test description.)

10.0 DISCUSSION OF INDIVIDUAL STUDIES: N/A

11.0 COMPLETION OF ONE LINER: N/A

12.0 CBI APPENDIX: N/A

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Fenbuconazole

Page_____ is not included in this copy.

Pages 5 through 12 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.

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.