

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

APR 28 1993

Dr. Dennis H. Lade
DowElanco
Quad IV
9002 Purdue Road
Indianapolis, IN 46268-1189

Dear Dr. Lade:

Subject: Clarification of the Leaching, Adsorption/Desorption
Data
DE-498
EPA File Symbol 62719-EEG, 62719-EEU and 62719-EEE
Your Submission Dated March 29, 1993

The Agency has clarified its position on leaching,
adsorption/desorption data for XRD-498 (see enclosed memo). In
summary, the leaching, adsorption/desorption data requirement is
fulfilled for XRD-498.

Sincerely yours,

Joanne I. Miller
Product Manager (23)
Fungicide-Herbicide Branch
Registration Division (H7505C)

Enclosure

CONCURRENCES

SYMBOL	H7505C							
SURNAME	Robbins							
DATE	4/26/93							



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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

20 April 1993

MEMORANDUM

SUBJECT: XRD-498 review of 12 March 1993

TO: Joann Miller
Product Manager #23
Registration Division (H7505C)

THRU: Paul Mastradone, Chief *Paul J. Mastradone*
Chemistry Review Section #1
Environmental Fate and Ground Water Branch (H7507C)

THRU: Hank Jacoby, Chief *Hank Jacoby*
Environmental Fate and Ground Water Branch
Environmental Fate and Effects Division (H7507C)

FROM: Gail Maske, Chemist *Gail Maske*
Chemical Review Section #1
Environmental Fate and Ground Water Branch (H7507C)

The registrant's, DowElanco, in a letter concerning the 12 March 1993 environmental fate review is requesting clarification of the leaching, adsorption/desorption data requirement status. Based on a review of the file and the 12 March 1993 review, no further leaching, adsorption/desorption data for XRD-498 are needed at this time. The unaged mobility data requirement was fulfilled 22 June 1990. In addition, following a review of the registrant's response to the 24 March 1992 review and addition environmental fate data, it was determined that there were no significant degradates of concern. Therefore, aged mobility data is not needed for XRD-498.

Footnote² in the 12 March 1993 review was not corrected to reflect this update. Therefore, the status of the leaching, adsorption/desorption data requirement was not clear to the registrant. In summary, the leaching, adsorption/desorption data requirement is fulfilled for XRD-498.