February 27, 1989

MEMORANDUM

SUBJECT: Dicofol (010501) - Time Extension Request for Plant Metabolism Study on Green Beans
Rohm and Haas letter of 6/23/88
[No MRID No., RCB No. 4344]

FROM: Susan V. Hummel, Chemist
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THRU: Francis B. Suhre, Acting Section Head
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TO: Dennis Edwards, PM#12
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Rohm and Haas has submitted a request for a time extension for the additional work on Plant Metabolism on Green Beans. Metabolism studies were required by the Dicofol Registration Standard (12/83). Metabolism studies on Citrus, Cottonseed, and Dry Beans were reviewed in our memo of 5/27/87 (S. Hummel, RCB No. 1869). All of the submitted metabolism studies were incomplete.

Rohm and Haas states that the samples from the green (sic) bean metabolism study conducted in 1979 have been discarded. They request a time extension of 18 months from the time of the EPA letter of 2/22/88 (until 8/22/89) to allow time to conduct a new metabolism study.

DEB Comment

We feel that this is a scientifically justifiable reason for a time extension. A metabolism study on either green or dry beans would be acceptable. We recommend that the time extension for a new bean metabolism study be granted. However, the granting of time extensions is not a scientific decision, but rather an administrative decision of the Reregistration and Special Review Division.
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