

US EPA ARCHIVE DOCUMENT

1035901  
June 3, 1991

NOTE TO: Ruth Allen

FROM: Dan Rieder

SUBJECT: Use of Bridging Data for Endothal and Salts

The EEB has considered the use of bridging data for endothal and its salts. Bridging data, in the form of the 6 basic ecological effect studies<sup>1</sup> will be acceptable. These tests must be performed on endothal<sup>2</sup> and on each of the salts of endothal, including disodium endothal, dipotassium endothal and the mono salt (alkyl amine). If these tests show the various forms of endothal to be substantially similar in toxicity, it may be justification to waive the higher tier tests. This includes those that are required, and those reserved. Specifically, estuarine studies are required for the three salts of endothal because of their registered uses. If the bridging data show the salts to be similar in toxicity, estuarine testing would be required only for one salt. The waiver of the bioaccumulation testing (72-6) with all three of the salts depends on the EFGWB. If they only require bioaccumulation with one salt, then EEB will concur.

The phyto-toxicity data, conversely, cannot be waived based on bridging data. Two primary reasons:

1. It is considered likely that these salts were developed to be efficacious on different types of plants under different conditions. Therefore, their toxicity is likely to be different.

2. "Bridging data" for plants would be the Tier II phyto-toxicity tests. The next Tier, if triggered, would be field studies. Since this would be performed using the particular end use products of concern, and each different salt is formulated into different end use products, bridging data could not provide scientific justification for a waiver. Field testing with any salt could not suffice for field testing with another salt.

If you have questions, please contact me.

<sup>1</sup> Avian acute oral LD50  
Avian dietary LC50 with an upland gamebird  
Avian dietary LC50 with a waterfowl  
Coldwater fish LC50  
Warmwater fish LC50  
Freshwater aquatic invertebrate EC50

<sup>2</sup> Since there are no registered uses of endothal and it is a manufacturing use product only, a reduced data set is required, see the Summary Report.

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