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

OFFICE OF
PESTICIDES AND TOXIC
SUBSTANCES

8/5/91

MEMORANDUM

SUBJECT: EFED'S Comments on Endothall
FROM: Kathy Monk, SACS/EFED
TO: Ernie Dobbins and Sue Rathman, SRRD

The DCI's for Endothall have been reviewed. Our comments are ordered by individual DCI, as you have structured it. With the exception that we recommend that each DCI have the following explanatory paragraph concerning the fate data requirements:

All environmental fate data requirements for the endothall acid will also be required for the salts of endothall, unless the registrant provides bridging data that quantifies the dissociation or ionization of endothall salts in comparison with the active ingredient. Additionally, the environmental fate assessment of the mono alkyl amine may be needed to support registration.

038901 Endothall (Acid)

According to our records the registrant indicated in the Phase 3 response that 163-2 (Laboratory Volatility) was not required. However, they did not offer an explanation of why it was not required and did not request a waiver for the study. Therefore, the laboratory volatility study is required and should appear on the DCI.

In the DCI the mono salt (038905) is referred to by various names, for example, "mono-dimethyl coco amine" under 71-1(b). The proper name is "mono-dimethyl alkyl amine".

None of the tests that are being held in reserve are listed on the inside sheets of the DCI. These tests should be listed there. They are:

161-4 Photolysis in Air
163-3 Field Volatility
164-5 Long-term Soil Dissipation
164-5 Long-term Aquatic Dissipation
165-2 Field Accumulation in Rotation Crops
165-5 Bioaccumulation--Aquatic Non-target
166-1 Ground Water--Small Prospective
166-2 Ground Water--Retrospective
166-3 Ground Water--Large Retrospective
167-1 Surface Water--Field Runoff
167-2 Surface Water--Surface Water Monitoring
202-1 Drift Field Evaluation

038903 Disodium Endothall

Should the comment for 72-6 say that the fish bioaccumulation test 165-4 will suffice, but see comments on 165-4.

The comment for 123-1 (a) should read, "This data requirement is reserved pending additional use or fate information indicating that transport to adjacent terrestrial or aquatic habitat is likely."

The comment for both 124-1 and 124-2 should be the same as 71-5 (a) not 123-1 (a).

038904 Dipotassium Endothall

72-2 (a) appears on the DCI cover sheet as a data gap. It is not a data gap because the tests 72-1 (a), 72-1 (c) and 72-2 (a) are required only on the Disodium salt (038903). It should be removed from the list. [It appears correctly on the inside sheets.]

The notation "Data Gap" is missing from the EPA DECISION column for 71-1 (a).

The comment for 72-5 should read "this data requirement is reserved pending results of lower tier tests, more complete use information, and more complete environmental fate information.

See above comment on 72-6. [The fish bioaccumulation test 165-4 will suffice, but see comments on 165-4].

According to our records, the registrant committed to 141-1 Honey Bee Acute Contact in Phase II. However, in Phase III a waiver of this study was requested, due to low honey bee exposure. Should there be a comment on the DCI? Currently it says simply "Data Gap". The waiver request is noted [and denied] for this test under 038905.

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038905 Mono-dimethyl alkyl amine salt

71-2 (b) is listed as a data gap on the inside sheets, but does not appear on the cover list.

In the comments for 71-1 (b) on 038901 you say that "This study, conducted on the mono-dimethyl alkyl amine salt (chemical 38905) will be further evaluated in Phave V for that chemical." Should that be noted here also for 71-1 (b)? Currently it simply lists 71-1 (b) as a data gap on the cover sheet and says nothing inside-- I think that is confusing.

The comment for 71-5 (a) should read, "This data requirement is reserved pending results of lower tier tests and more complete use and environmental fate information.

The comment "See 71-5 (a)" should be included for 72-4 (b).

For 72-5 why not just say "See 71-5 (a)", which is what the two before it say.

Did you mean to list 71-2 (a) as a data gap? [Although they committed to a study--was it, according to your notes, only for the acid?]

See above comment on 72-6. [The fish bioaccumulation test 165-4 will suffice, ubt see comments on 165-4.]

If there are any questions please call Kathy Monk, 557-3120

cc: Anne Barton