This was a KBN study that was changed. The original study is followed by an explanation of the first and last pages of the changed study.

DATA EVALUATION RECORD

1. **CHEMICAL:** Molinate.
   Shaughnessey No. 041402.

2. **TEST MATERIAL:** 1. Non-radiolabelled Ordram Technical; Lot No. WRC 4921-8-9; 97.5 ingredient; an amber liquid;
   2. $^{14}$C-Ordram; Lot No. WRC 6334-46-5.

3. **STUDY TYPE:** Daphnid Flow-Through Life-Cycle Chronic Toxicity Test. Species Test *Daphnia magna*.


5. **REVIEWED BY:**
   Louis M. Rifici, M.S.  
   Associate Scientist  
   KBN Engineering and  
   Applied Sciences, Inc.  
   Signature:  
   Date:

6. **APPROVED BY:**
   Pim Kosalwat, Ph.D.  
   Senior Scientist  
   KBN Engineering and  
   Applied Sciences, Inc.  
   Signature:  
   Date:
   Henry T. Craven, M.S.  
   Supervisor, EEB/HED  
   USEPA  
   Signature:  
   Date:

7. **CONCLUSIONS:** This study is scientifically sound and meets the guideline requirements for chronic, flow-through toxicity test for the freshwater invertebrate, *Daphnia magna* $^{14}$C-Ordram, based on the most sensitive biological parameters, daphnid reproductive carapace length, was >0.38 ppm and <0.90 ppm mean measured concentrations (g mean = 0.59 ppm).

8. **RECOMMENDATIONS:** N/A.

9. **BACKGROUND:**

10. **DISCUSSION OF INDIVIDUAL TESTS:** N/A.

11. **MATERIALS AND METHODS:**
A. **Test Animals:** *Daphnia magna* (<24 hours old) were obtained from in-house cultures. The primary culture was obtained from the Columbia National Fisheries Laboratory in Columbia, MO. The cultures were housed in a temperature controlled (20°±2°C) on a 16-hour daylight photoperiod with 30 minute dawn/dusk simulated light intensity was maintained at 50-70 ft-candles.

Adult daphnids were fed a suspension of algae (*Selenastrum capricornutum*) supplemented with a Tetramin® cereal leaves, and yeast suspension.

B. **Test System:** The proportional diluter delivered 2.9 mL/chamber/minute (or replacements per day). Flow splitting chambers were used to mix and divide the solution. To minimize turbulence, the solutions were delivered to the test chambers through hypodermic needles. The diluter system was calibrated before use.

The test vessels were 1-L beakers with stainless steel screens (50 mesh) or drains. The test chambers were immersed in a temperature-controlled water bath at 20°±2°C.

The characteristics of the aged well water are given in Table 1 (attached).

A sample of non-radiolabelled Ordram Technical was mixed with a 24 mg/mL solution of Ordram and diluted to volume in acetone. The radiopurity of the stock was determined by liquid scintillation counting (LSC) to be 100%. The stock was delivered to the diluter using a syringe dispenser.

C. **Dosage:** Twenty-one-day, flow-through, life-cycle chronic toxicity test. Before the preliminary test, five nominal concentrations (0.072, 0.12, 0.25, 0.43, 1.01 dilution water control and a solvent control (0.05 mL acetone/L) were selected.

D. **Design:** Four chambers were used for each concentration with ten randomly-placed daphnids per chamber. Survival was recorded on Monday, Wednesday, and Friday. Neonates were first observed in the chambers; survival was then assessed daily. The adult daphnids were counted every Monday, Wednesday, and Friday by removing the adult daphnids and the test solution through a 50-mesh stainless steel screen. The collected daphnids were placed in shallow glass vessels, counted, and discarded. The test solution was replaced, along with the adult daphnids, back into the chamber. The test vessels were cleaned on each counting day. At test termination, the daphnids were measured.

The daphnids were fed 20-30 mL of an algal suspension (*Selenastrum capricornutum*) three times daily and 2 mL of a Tetramin®-cereal leaves-yeast suspension on alternate days.

The dissolved oxygen (D.O.) and pH were measured in the dilution water control and high concentration on days 0, 4, 7, 14, and 21. The temperature bath was measured daily with a mercury thermometer and continuously with a logger. The above parameters and conductivity, hardness, and alkalinity were measured weekly.

14C-Ordram Technical concentrations were measured by liquid scintillation on four samples taken on days 0, 4, 7, 14, and 21.

E. **Statistics:** Daphnid survival, growth (length), and reproduction (young/adult/reproduction day) were analyzed using analysis of variance (ANOVA) and Dunnett's test. The proportional survival data were arc-sine transformed. The control and solvent control data were pooled.
12. **REPORTED RESULTS:** The mean measured concentrations were 0.065, 0.11, 0.23, 0.38, and 0.90 µg/L and averaged 88-92% of nominal. Measured concentrations fairly consistent between sampling days (Table 2, attached).

The concentration of $^{14}$C-Ordram had no significant effect on daphnid survivability in a 21-day test (Table 3, attached). Adult daphnid lengths at 0.11 and 0.9 measured concentrations were significantly lower than that of the pooled control. The length difference was statistically different; it was not considered significant since two higher test concentrations were not significantly different from the controls.

No young were observed until 7 days into the study. The number of young per reproductive day at "0.38 and 0.90 ppm" were significantly affected as compared to controls.

Based on the analysis of survival, growth, and reproduction, the maximum toxicant concentration (MTC) limits were estimated to be 0.38 and 0.90 measured concentration.

The pH of the test solutions ranged from 8.1 to 8.4. Dissolved oxygen ran 8.7 mg/L or 76 to 95% of saturation at 20°C. The temperature of the test was maintained at 20°C during the study.

13. **STUDY AUTHOR'S CONCLUSIONS/QUALITY ASSURANCE MEASURES:**

The author presented no conclusions other than those previously mentioned.

Quality Assurance and GLP Compliance Statements were included in the study, indicating adherence to USEPA GLP Regulations.

14. **REVIEWER'S DISCUSSION AND INTERPRETATION OF STUDY RESULTS:**

A. **Test Procedure:** The test procedures were generally in accordance with protocols recommended by ASTM (1985), but deviated as follows:

The conductivity, hardness, and alkalinity of the dilution water were monitored weekly. ASTM (1985) states that these parameters must be measured at the beginning and end of the test. The conductivity must be low, medium, and high concentration test solutions weekly.

Treatments must be randomly assigned to the test chambers. The reviewer noted that if the treatments were not random, it may affect the results.

B. **Statistical Analysis:** The reviewer used a one-way analysis of variance (ANOVA) to analyze the survival and reproduction (average number produced per adult per reproductive day) of daphnids after 21 days. The data were arcsine square root transformed before the analysis. The treatment concentration (NOEC) for survival and reproduction were 0.9 ppm, respectively (see attached printouts 1 and 2). Adult daphnid lengths were analyzed using Crunch Version 3, the raw length data (in µm), an analysis of variance. Daphnid length at 0.11 and 0.90 ppm was significantly lower than the control. However, as suggested by the author, it is possible that the daphnid length at 0.11 ppm was affected by the toxicant. Therefore, the 0.38 ppm (mean measured concentration; see printout 3) was the control and solvent control were pooled prior to all analyses.
C. **Discussion/Results:** In the Results section of the report (page 16), states that the mean young/adult/reproduction day at 0.38 and 0.90 significantly lower than the pooled controls. While the mean at 0.3 than the controls (6.443 vs. 8.116), the statistical analysis, repo reported MATC limits given in the report suggest that there was no difference at 0.38 ppm. The reviewer believes that the author made the only statistically significant effect on reproduction was at 0.90 This study is scientifically sound and meets the guideline requir chronic, flow-through toxicity test for the freshwater invertebrate, . The MATC, based on the most sensitive biological parameters, reproduction and length, was >0.38 ppm and <0.90 ppm mean meas concentration (geometric mean = 0.59 ppm).

D. **Adequacy of the Study:**

(1) **Classification:** Gore-Supplemental

(2) **Rationale:** N/A.

(3) **Repairability:** N/A.

15. **COMPLETION OF ONE-LINER FOR STUDY:** Yes, 06-17-91.

MEMORANDUM

Subject: Change of a Molinate chronic Daphnia magna "Supplemental." D182484, S425136, MRID 406578-02.

From: James J. Goodyear, Ph.D.
Biologist, Section 1
Ecological Effects Branch
Environmental Fate and Effects Division (H7507C)

To: Files.


ICI Americas, Inc., Agricultural Products, Wilmington, Delawar

KBN rated the study "Core." However, since the study did not measure Molinate upon the dry weights of the Daphnids, it does not meet t requirements or the ASTM protocol, which they stated they were followin measurement that they did do (length) is less reliable than that of dry

EEB has downgraded the study to "Supplemental" for growth (LOEC = and NOEC = 0.90 ppm) with no possibility of repair. It is still "Core effects (LOEC = 0.38 ppm and NOEC = 0.90 ppm).
DATA EVALUATION RECORD
MOLINATE TEP

1. **CHEMICAL**: Molinate. Shaughnessey No. 041402.

2. **TEST MATERIAL**: 1. Non-radiolabelled Ordram Technical; Lot No. WRC 4921-8-9; 97.5 ingredient; an amber liquid; 2. 14C-Ordram; Lot No. WRC 6334-46-5.

3. **STUDY TYPE**: Daphnid Flow-Through Life-Cycle Chronic Toxicity Test. Species Test *Daphnia magna*.


5. **REVIEWED BY**:
   James J. Goodyear
   Signature:
   Biologist, Section 1
   Ecological Effects Branch
   Environmental Fate and Effects Division (H7507)

6. **APPROVED BY**:
   Leslie W. Touart
   Signature:
   Head, Section 1
   Ecological Effects Branch
   Environmental Fate and Effects Division (H7507)

7. **CONCLUSIONS**: This study is scientifically sound, but it does not meet the require Guideline 72-4(b) Aquatic invertebrate life cycle. The reproduction and length p study are "Core." Their MATCs were both >0.38 ppm and <0.90 ppm mean measured concentrations (geometric mean = 0.59 ppm). The study did not measure the effect Ordram (TEP Molinate) upon dry weight, therefore EEB considers the study to be "Supplemental." The study must be repeated and the dry weight must be measured.

8. **RECOMMENDATIONS**: N/A.
reproduction were 0.90 and 0.38 ppm, respectively (see attached printouts 1 and 2). Ad length was analyzed using Crunch Version 3, the raw length data (in pm), and two-way an variance. Daphnid length at 0.90 ppm was significantly lower than the control. Ho suggested by the author, it is unlikely that daphnid length at 0.11 ppm was affected by Therefore, the NOEC was 0.38 ppm (mean measured concentration; see printout 3). The ne control and solvent control were pooled prior to all analyses.

C. Discussion/Results: In the results section of the report (page 16), the author's mean young/adult/reproduction day at 0.38 and 0.90 ppm were significantly lower than th controls. While the mean at 0.38 ppm is lower than the controls (6.443 vs. 8.116), the report summary, and reported MATC limits given in the report suggest that there was no difference at 0.38 ppm. The reviewer believes that the author made an error and the on significant effect on reproduction was at 0.90 ppm.

This study is scientifically sound but does not meet the guideline requirements for a c toxicity test for the freshwater invertebrate, Daphnia magna. The dry weights of the d taken. The MATC, based on daphnid reproduction and and length, was >0.38 ppm and <0.90 measured concentration (geometric mean = 0.59 ppm).

D. Adequacy of the Study:

(1) Classification: supplemental

(2) Rationale: The dry weights of the daphnids were not measured.

(3) Repairability: not repairable

15. COMPLETION OF ONE-LINER FOR STUDY: no

DATA EVALUATION RECORD

1. **CHEMICAL:** Molinate.
   Shaughnessey No. 041402.

2. **TEST MATERIAL:** 1. Non-radiolabelled Ordram Technical; Lot No. WRC 4921-8-9; 97.5 ingredient; an amber liquid;
   2. $^{14}$C-Ordram; Lot No. WRC 6334-46-5.

3. **STUDY TYPE:** Daphnid Flow-Through Life-Cycle Chronic Toxicity Test. Species Test
   *Daphnia magna*.


5. **REVIEWED BY:**

   Louis M. Rifici, M.S.  
   Associate Scientist  
   KBN Engineering and  
   Applied Sciences, Inc.  
   **Signature:** 
   **Date:**

6. **APPROVED BY:**

   Pim Kosalwat, Ph.D.  
   Senior Scientist  
   KBN Engineering and  
   Applied Sciences, Inc.  
   **Signature:** 
   **Date:**

   Henry T. Craven, M.S.  
   Supervisor, EEB/HED  
   USEPA  
   **Signature:** 
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8. **RECOMMENDATIONS:** N/A.