

US EPA ARCHIVE DOCUMENT

Rick Petrie

Branch
FILE

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SHAUGHNESSY NO

REVIEW NO.

EEB REVIEW

DATE IN: 9-5-91 OUT: _____

OCT 7 1991

CASE # : 818944

OCT 7 1991

SUBMISSION # : S401099

ID # : 056002

DATE OF SUBMISSION 7-2-91

DATE RECEIVED BY EFED 9-4-91

SRRD/RD REQUESTED COMPLETION DATE 10-5-91

EEB ESTIMATED COMPLETION DATE _____

SRRD/RD ACTION CODE/TYPE OF REVIEW 614 DATA WAIVER REQUEST

MRID #(S) _____

DP TYPE 001 SUBMISSION RELATED DATA PACKAGE

PRODUCT MANAGER, NO. LARRY SCHNAUBELT 72

PRODUCT NAME(S) 1-NAPHTHALENEACETIC ACID

TYPE PRODUCT F R I N H D PLANT GROWTH REGULATOR

COMPANY NAME AMVAC CHEM. CORP. AND CHAS H. LILLY CO.

SUBMISSION PURPOSE REGISTRANTS REQUEST WAIVER OF PLANT DATA

REQUIREMENTS FOR USE ON APPLES, PEARS

AND CITRUS

COMMON CHEMICAL NAME _____



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

D167721

OFFICE OF
PESTICIDES AND TOXIC
SUBSTANCES

OCT 7 1991

MEMORANDUM

SUBJECT: Chas H. Lilly Chemical Company Minor Use/Low Volume Data
Waiver Request For The Potassium Salt Formulation
Of naphthaleneacetic acid (NAA)

FROM: Douglas J. Urban, Acting Chief
Ecological Effects Branch
Environmental Fate And Effects Division (H7507C) *Douglas J. Urban 10/4/91*

TO: Larry Schnaubelt, PM - 72,
Reregistration Branch
Special Review And Reregistration Division (H7508W)

The Ecological Effects Branch (EEB) has reviewed the minor use, low volume data waiver request submitted by Chas H. Lilly Chemical Company for their potassium salt formulation of NAA. Registered NAA use sites include apples, pears, olives, citrus, and ornamentals. Through the data call-in process, the EEB has officially requested the following NAA studies:

- 122-1 (a) Non-target plant study using the potassium salt form.
- 122-1 (b) Non-target plant study using the potassium salt form.
- 122-2 Non-target aquatic plant using Lemna gibba and Selenastrum capricornutum

Based on a review of currently registered use patterns and domestic usage, the EEB does not grant a waiver for the above listed studies. The potassium salt form is the most widely used NAA formulation and the use pattern includes aerial application. The cost of conducting these studies is not expected to exceed \$20,000 to \$25,000.

If you have any questions regarding this review, please contact Richard Petrie at 557-7358 (Room 1024G - CM2).

cc: Amy Rispin



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

D167721

MEMORANDUM

OCT 7 1991

OFFICE OF
PESTICIDES AND TOXIC
SUBSTANCES

SUBJECT: Amvac Chemical Company Minor Use/Low Volume Data
Waiver Request For naphthaleneacetic acid and It's
Salts, Esters, and Acetamide Formulations.

FROM: Douglas J. Urban, Acting Chief
Ecological Effects Branch
Environmental Fate And Effects Division (H7507C) *Douglas J. Urban* 10/4/91

TO: Larry Schnaubelt, PM - 72,
Reregistration Branch
Special Review And Reregistration Division (H7508W)

The Ecological Effects Branch (EEB) has reviewed the minor use, low volume data waiver request submitted by Amvac Chemical Company on 06/12/91 for naphthaleneacetic acid (NAA) and it's various formulations. The registered uses covered by this request include apples, pears, olives, citrus and ornamentals. Through the data call-in process, the EEB has officially requested the following NAA studies:

- 71-2 (a) Acute Avian Dietary. Two studies are required
(ethyl ester and amide formulations) -----\$ 10,000
- 72-1 (a) Acute bluegill. One study is required
(ethyl ester) -----\$ 8,500
- 72-2 (a) Acute Daphnia magna. One study is required
(ethyl ester) -----\$ 10,000
- 122-1 (a) Non-target plant. Six sets are required
(acid, ethyl ester, ammonium salt, sodium
salt, potassium salt, amide) -----\$ 54,000
- 122-1 (b) Non-target plant. Six sets are required
(same 6 forms as 122-1.a above) -----\$ 36,000
- 122-2 Non-target aquatic plant. Six sets are
required (same 6 forms as 122-1.a above)--\$ 42,000
using Lemna gibba and Selenastrum
capricornutum

TOTAL (Amvac Estimates) \$ 160,500

Based on a review of currently registered use patterns and domestic usage of the various forms of NAA, the EEB will reduce the above listed data requirements to the following*:

71-2 (a)	Two studies using ethyl ester and amide forms. -----	\$ 10,000
72-1 (a)	One study using the ethyl form. -----	\$ 8,500
72-2 (a)	One study using the ethyl form. -----	\$ 10,000
122-1 (a)	Two studies using the potassium salt and the ammonium salt forms. -----	\$ 18,000
122-1 (b)	Two studies using the potassium salt and the ammonium salt forms. -----	\$ 12,000
122-2	Two sets using the potassium salt and the ammonium salt forms. -----	\$ 14,000
TOTAL (Avmac Estimates)		\$ <u>72,500</u>

This reduction in data requirements would result in a total cost reduction, by Avmac estimates, of \$ 88,000.

- * The potassium salt, sodium salt, and ammonium salt forms are applied aeriially. The potassium salt form has the highest domestic usage, the acid form the lowest. The ammonium salt label (5481-66) warns that ornamental plants must be covered with a plastic sheet to prevent injury from drift.

In the Avmac data waiver request, they stated that they may cancel the ethyl ester and ammonium salt forms of NAA. If the registrant were to cancel these forms, the EEB data requirements would be reduced further to the following:

71-2 (a)	One study using the amide form. -----	\$ 5,000
122-1 (a)	One study using the potassium salt -----	\$ 9,000
122-1 (b)	One study using the potassium salt -----	\$ 6,000
122-2	One study using the potassium salt -----	\$ 7,000
TOTAL (Avmac Estimates)		\$ <u>27,000</u>

If Amvac cancels the ethylester and ammonium salt formulations, the total test cost reduction (by Amvac estimates) would be \$133,500. The EEB feels that this is a reasonable reduction in data requirements given the minor use status of NAA.

If you have any questions regarding this review, please contact Richard Petrie at 557-7358 (Room 1024G -CM2).

cc: Amy Rispin