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

R.F.

FEB 21 1989

OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: PCNB (Terraclor® Technical; Id. #400-401). Uniroyal  
12/30/88 response to Registration Standard: Request  
for a Second Time Extension - Plant/Animal Metabolism.  
No MRID No. Branch No. 4857.

FROM: Kenneth W. Dockter, Chemist  
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THRU: A.R. Rathman, Section Head  
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TO: Lawrence J. Schnaubelt/Herman T. Toma, PM Team 21  
Registration Division (TS-767C)

By letter dated 12/30/88, Uniroyal Chemical Company, Inc., registrant of Terraclor® Technical, Id. #400-401 containing pentachloronitrobenzene (PCNB) as AI, is requesting a second time extension for the submission of data on the plant and animal metabolism of PCNB required by the Registration Standard issued 2/5/87. The original due date, 7/3/88, was extended in response to the Company's 5/12/88 letter request to 1/3/88; "new expected date" is 12/31/89.

The reasons and proposed due dates given are:

1 - Nature of Residue - Plants:

**Cabbage** - Study is nearly complete at contract lab (Hazleton); expect final report in 3/89. But, progress was slowed unexpectedly due to the large percentage of polar metabolites (aqueous soluble) which are difficult to characterize. They are currently using chemical modification (e.g., "Ra-Ni" reduction of aqueous extracts) to aid in identification. Hence, a 1-year due-date extension to 12/31/89 is requested. Uniroyal plans to submit a preliminary report on 4/1/89.

**Peanuts & potatoes** - The contractor failed to start replant of these 2 studies due to greenhouse problems. Uniroyal has asked the contractor to send them the <sup>14</sup>C-PCNB. The registrant plans to initiate and analyze these 2 studies in-house. They expect to replant in 1/89, harvest in Mar-Apr 89, complete analyses by 10/89, and submit final report by 12/89. Hence, a 1-year due-date extension to 12/31/89 is requested. Uniroyal plans to submit a progress report on 4/1/89.

## 2 - Nature of Residue - Livestock:

**Goat** - Due to lack of progress by contractor, Uniroyal will continue this study in-house. The contractor will provide a status final report on the in-life treatment phase and partial analysis by 2/89. As found in **cabbage**, a large percentage of the goat metabolites are aqueous soluble and will require extensive characterization for identification. Since complete metabolite identification is expected by 10/89, a 1-year due-date extension to 12/31/89 is requested. Uniroyal plans to submit a preliminary report on 4/1/89.

**Poultry** - After the in-life phase was completed by the contractor, Uniroyal began analysis in-house. Representative tissues and eggs have been extracted and metabolites partially characterized. Again, a large percentage of extractables are aqueous soluble and will require extensive characterization. Complete metabolite identification is expected by 10/89. Hence, a 1-year due-date extension to 12/31/89 is requested. Uniroyal plans to submit a preliminary report on 4/1/89.

## DISCUSSION

PR Notice 85-5 provides guidance on the Agency's policy for the granting of time extensions for submitting requested data. One of the circumstances identified is unavoidable analytical problems.

Uniroyal claims, for a **second** time, contract lab problems, and because of this unsatisfactory progress, terminated several contracts and will now complete the studies in-house. We consider Uniroyal's time extension request until 12/31/89 for the submission of data from those studies to be reasonable. RD considerations permitting, we have no objection to the granting of this proposed **second** time extension request.

## CONCLUSIONS

- RD considerations permitting, the Branch has no objection to the granting of the requested time extensions on :

- Nature of the Residue - Plants ----- 12/31/89

- Nature of the Residue - Livestock ----- 12/31/89
- 2. The Branch recognizes the granting of time extension requests is an administrative decision of the Registration Division.

PM NOTE: Uniroyal also states that they will be submitting a formal written request to meet in late January or early February with Agency residue chemistry reviewers to discuss these studies, ongoing field residue studies, and timing for converting interim PCNB tolerances to permanent tolerances.

cc: K. Dockter (DEB), D. Schmitt, PCNB Subject & Reg. Std. Fs.,  
E. Eldredge (ISB/PMSD), Circulation (7), RF.  
RDI: ARRathman:2/17/89:EZager:2/17/89  
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