To: Jacoby/Beavers
Product Manager #21
Registration Division (TS-767).

From: Richard V. Moraski, Acting Chief
Environmental Chemistry Review Section No. 1
Exposure Assessment Branch
Hazard Evaluation Division (TS-769c)

Attached please find the EAB review of...

Reg./File No.: 2204-ER

Chemical: chlorothalonil

Type Product: Microbiocide

Product Name: Biocide No. 1

Company Name: Diamond Shamrock

Submission Purpose: Fast track - no data

ZBB Code: 3(c)(7)

Date In: 5/4/83

Date Completed: 18 MAY 1983

Deferrals To:

Ecological Effects Branch

Residue Chemistry Branch

Toxicology Branch

ACTION CODE: 170

EFB #: 3356

TAIS (level II) Days

62 1.5
1.0 INTRODUCTION

Chemical Name and Type of Pesticide: chlorothalonil,-2,4,5,6-tetrachloroisophthalonitrile, 40.4% ai, microbiocide.

Trade Name: Biocide No. 1, BRAVO 500

Chemical Structure:

Diamond Shamrock is applying for the registration of Biocide No. 1 to be used to control heterotrophic bacteria in drilling mud and oil field processing fluids containing starch or watersoluble polymers. The formulation of Biocide No. 1 is identical to that of BRAVO 500.

2.0 DIRECTION FOR USE

See attached label.

3.0 DISCUSSION OF DATA

No new data submitted. The previous review (9 Mar 1983, new use pattern for application on peaches) cited as still outstanding a valid leaching study that was requested in an earlier review (7 Dec 1982, use on citrus). EAB concurred with the citrus use on the condition that the leaching study is performed.

EAB was told by the PM, H. Jacoby, that a groundwater monitoring study is being done in place of the leaching study.

4.0 CONCLUSION/RECOMMENDATION

4.1 We have not received a response to our two requests to fill the leaching study data gap for chlorothalonil and its metabolites.

4.2 While we heartily endorse the undertaking of a groundwater monitoring study that would add to the data base for chlorothalonil and its metabolites, it is not a substitute for a leaching study.

4.3 The leaching study requirement, using aged soil (30 days or one half-life), may be met in one of three ways:
1. Soil column study

2. Soil thin-layer chromatography study

3. Batch equilibrium (adsorption/desorption) study

4.4 Another option is open to the registrant: a request to waive the leaching study data requirement, supported by data from studies already performed.

Herbert L. Manning, Ph.D.
Review Section No. 1
EAB/HED
The material not included contains the following type of information:

___ Identity of product inert ingredients.
___ Identity of product impurities.
___ Description of the product manufacturing process.
___ Description of quality control procedures.
___ Identity of the source of product ingredients.

✓ Sales or other commercial/financial information.
✓ A draft product label.

___ The product confidential statement of formula.
___ Information about a pending registration action.
___ FIFRA registration data.
___ The document is a duplicate of page(s) ________.
___ The document is not responsive to the request.

The information not included is generally considered confidential by product registrants. If you have any questions, please contact the individual who prepared the response to your request.