081901
Shaughnessy No.

Date out of EAB: 18 MAY 1983

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)

FILE COPY

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)

ACTION CODE: 170

Date In: 5/4/83

EFB # 3356

Date Completed: 18 MAY 1983

TAIS (level II)	Days
62	1.5

Deferrals To:

_____ Ecological Effects Branch

_____ Residue Chemistry Branch

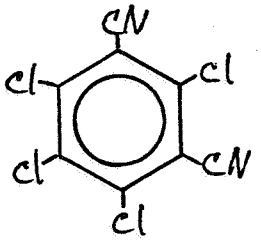
_____ Toxicology Branch

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 water-soluble 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 ealier 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

Herbert L. Manning, Ph.D.
Review Section No. 1
EAB/HED

Page_____ is not included in this copy.

Pages 4 through 5 are not included.

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.