To: Dennis Edwards  
Product Manager 12  
Registration Division (TS-767)

From: Therese M. Dougherty, Chief  
Environmental Fate Review Section #1  
Exposure Assessment Branch  
Hazard Evaluation Division (TS-769C)

Attached, please find the EAB review of...

Reg./File #: 45639-EUP-27
Chemical Name: Amitraz
Type Product: Insecticide
Product Name: MITAC EC
Company Name: NOR AM
Purpose: EUP for use on Cotton

Date Received: 7/22/87  Action Code: 756
Date Completed: 10/26/87  EAB #s: 70823
Monitoring study requested:___  Total Reviewing Time: 1.00 day
Monitoring study voluntarily:___

Deferrals to: ___ Ecological Effects Branch
___ Residue Chemistry Branch
___ Toxicology Branch
1.a **CHEMICAL:** Amitraz.

1.b **Physical Properties:** Not included with this submission.

2. **TEST MATERIAL:** N/A.

3. **STUDY/ACTION TYPE:** An EUP request for use on Cotton.

4. **STUDY IDENTIFICATION:** N/A

5. **REVIEWED BY:**
   
   Akiva D. Abramovitch, Ph.D.
   Chemist
   Environmental Chemistry Review Section 1/EAB/HED/OPP

6. **APPROVED BY:**
   
   Therese M. Dougherty, Chief
   Environmental Chemistry Review Section 1/EAB/HED/OPP

7. **CONCLUSIONS:**

   EAB does not concur with the registrant's request for an EUP on Cotton.

   The Registration Standard on Amitraz of Sept. 19, 1984 indicates that the basic data requirements for the EUP on Cotton, **hydrolysis**, **aerobic soil**, **fish accumulation**, **leaching** and **crop rotation** remain unsatisfied. In addition, the available soil TLC leaching data from the Registration Standard, in partial fulfillment of the leaching data requirement, indicate that Amitraz has intermediate mobility in sandy loam, silt loam and clay soils and high mobility in sand to warrant concern about ground water contamination (see attachments).

8. **RECOMMENDATIONS:**

   EAB recommends that an EUP should not be granted until all the data requirements for the EUP are satisfied and the leaching potential and the risks associated with Amitraz entering groundwater are fully assessed.

9. **BACKGROUND:**

   A. **Introduction:** See the Registration Standard on Amitraz of Sept. 19, 1984.

   B. **Directions for Use:** The experimental plan for using Amitraz on cotton was not specified. The label for Mitec 1.5 EC on cotton is attached.

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

11. **COMPLETION OF ONE LINER:** Not completed.

12. **CBI APPENDIX:** None.