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OFFICE OF
PESTICIDES AND TOXIC
SUBSTANCES

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MEMORANDUM

SUBJECT: Amendment of EFED List C Review for Poly (hexamthylenebiguanide) (case number 3122)

FROM: Bernice Slutsky *Bernice Slutsky*
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TO: Linda Deluise
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THRU: Amy Rispin, Chief *Amy Rispin*
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Because the use pattern for this chemical includes oil recovery drilling muds the following revisions in EFED data requirements have been made:

EEB DATA REQUIREMENTS

Because oil well use can result in discharge to the aquatic environment, the following data are required:

- 72-1(b) acute fish tox. ((bluegill)
- 72-1(c) acute fish tox. (trout)
- 72-1(d) Acute fish tox. (trout)
- 72-2(a) acute aquatic invert. tox. (this study has been reviewed and the requirement is satisfied)
- 72-2(b) Acute aquatic Invert. Tox.

Because oil wells can be associated with coastal wetland, estuarines or marine environment the following data are required:

- 72-3(a) Acute estu/mari tox fish
- 72-3(b) acute estu/mari tox. mollusk
- 72-3(c) acute estu/mari tox shrimp

- 72-3(d) acute estu/mari tox fish (TEP)
- 72-3(e) acute estu/mari tox mollusk (TEP)
- 72-3(f) acute estu/mari tox shrimp (TEP)

Because oil well use can result in discharge to the aquatic environments (both freshwater and estuarine) on a recurrent basis, the following studies are required:

- 72-4(a) early life-stage fish
- 72-4(b) life-cycle aquatic invertebrate

EFGWB DATA REQUIREMENTS

Given the potential for discharge to aquatic environments, the Fate chapter has been amended to currently require the following studies:

- 161-1 Hydrolysis
- 161-2 Photodegradation in water
- 161-3 photodegradation in soil
- 162-1 Aerobic soil metabolism
- 162-3 Anaerobic soil Metabolism¹
- 163-1 Leaching, adsorption/desorption²
- 165-4 Fish bioaccumulation

If the registrant's explanation leads us to believe that significant environmental exposure may result from the "closed" uses of this chemical, then the following additional field studies should be imposed immediately:

- 164-1 Terrestrial field dissipation
- 164-2 Aquatic sediments
- 165-3 Accumulation in irrigated crops
- 165-5 Accumulation in aquatic non-target organisms

cc:

Anne Barton
Hank Jacoby
Doug Urban
Cover Memo File

¹The Anaerobic (soil) Metabolism data requirement normally applies, but in light of possible aquatic exposure, the Anaerobic Aquatic (sediment) Metabolism data requirement is preferred.

²The batch equilibrium protocol is preferred for the mobility studies.