RECORD NO. 121601

EEB REVIEW

DATE: IN 08-14-88 OUT 03-09-89

FILE OR REG. NO. 109

PETITION OR EXP. NO.

DATE OF SUBMISSION 08-10-88

DATE RECEIVED BY EFED 08-17-88

RD REQUESTED COMPLETION DATE 11-03-88

EEB ESTIMATED COMPLETION DATE 11-03-88

RD ACTION CODE/TYPE OF REVIEW 350

TYPE PRODUCT(S) Herbicide

DATA ACCESSION NOS.

PRODUCT MANAGER NO. R. Taylor (25)

PRODUCT NAME(S) Acetochlor

COMPANY NAME ICI Americas, Inc.

SUBMISSION PURPOSE Submission of meeting minutes for review by EEB

SHAUGHNESSEY NO. CHEMICAL AND FORMULATION % AI

121601 Acetochlor
MEMORANDUM

March 9, 1989

SUBJECT: 5/27/88 Meeting Minutes for ICI/EEB Meeting

FROM: James W. Akerman, Chief
Ecological Effects Branch
Environmental Fate and Effects
Division (H7507C)

TO: Robert J. Taylor, PM-25
Fungicide-Herbicide Branch
Registration Division (H7505C)

In response to the meeting minutes provided for the subject meeting, it appears that most of the points are in agreement with our notes (see copy attached). However, point 6 requires some comment/clarification:

Tier II phytotoxicity data requirements are normally in effect for chemicals which are herbicides. However, these Tier II requirements are not automatic. The Agency must examine the physical/chemical properties of the chemical and the proposed application procedures in order to determine if Tier II studies are required. (If this information/data are provided to EEB, we can make that determination.) Also, general guidance on how to perform phytotoxicity studies is available in Subdivision J. EEB (Charlie Lewis) does not provide protocols to registrants. We will, however, review protocols submitted to the Agency.

If there are any questions on the above, please contact Norm Cook of my staff at 557-0322.

cc: C. Lewis, EEB
# REGISTRATION DIVISION DATA REVIEW RECORD

**Confidential Business Information – Does Not Contain National Security Information (E.O. 12065)**

**ACETOCHLOR**

### 15. INSTRUCTIONS TO REVIEWER

**A. HED**
- Total Assessment - 3(c)(5)
- Incremental Risk Assessment - 3(c)(7) and/or E.L. Johnson memo of May 12, 1977.
- Review Requires Less Than 4 Hours

**B. SPRD**
- Send Copy of Form to SPRD PM
- Chemical Undergoing Active RFAQ Review
- Chemical Undergoing Active Registration Standards Review

### 16. RELATED ACTIONS

None

### 17. 3(c)(1)(D)
- Use Any or All Available Information
- Use Only Attached Data
- Use Only the Attached Data for Formulation and Any or All Available Information on the Technical or Manufacturing Chemical.

### 18. REVIEWS SENT TO

- TOB  [X]
- EEB  [X]
- EF  [ ]
- PL  [ ]
- RCB  [X]
- EFB  [X]
- CH  [ ]
- BFSD  [ ]

### 19. TYPE OF REVIEW

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<th>TOXICOLOGY</th>
<th>ECOLOGICAL EFFECTS</th>
<th>RESIDUE CHEMISTRY</th>
<th>ENVIRONMENTAL DATE</th>
<th>CHEMISTRY</th>
<th>EFFICACY</th>
<th>PRECAUTIONARY LABELING</th>
<th>ECONOMIC ANALYSIS</th>
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<td>SLN</td>
<td>Sec. 18</td>
<td>Inert</td>
<td>MNR. USE</td>
<td>Other</td>
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### 20. Label Submitted with Application Attached
- [ ]

### 21. Confidential Statement of Formula
- [ ]

### 22. Representative Labels Showing Accepted Uses Attached
- [ ]

### 23. Date Returned to RD (to be completed by HED)
- [ ]

### 24. Include an Original and 4 (four) Copies of This Completed Form for Each Branch Checked for Review.
- [ ]

EPA Form 8570-13 (Rev. 11-81) PREVIOUS EDITIONS ARE OBSOLETE.
CERTIFIED MAIL
RETURN RECEIPT REQUESTED

August 10, 1988

Mr. Robert J. Taylor
Product Management Team (25)
Fungicide-Herbicide Branch
Registration Division (TS-767C)
U.S. Environmental Protection Agency
401 M Street SW
Washington, DC 20460

Dear Mr. Taylor:

RE: ICI/EPA Meetings of May 26 and 27, 1988
Acetochlor

ICI Americas Inc. has prepared a summary of the key issues discussed at our May 26 and May 27 meetings with EAB, RCB and EEB to discuss registration data requirements for acetochlor, the chloroacetanilide compound which is being developed by ICIA.

We would be grateful for your review and comment/concurrence with the summary.

Thank you for your assistance in this matter.

Sincerely,

Barbara J. Kaminski
Senior Pesticide Regulatory Specialist

BJK/sfp

081088SFP101

Wilmington, Delaware 19897 Phone (302) 575-3000
ICI was grateful for the opportunity to meet and discuss with the Agency.

1. Avian reproduction studies (71-4)

EEB would like to see this study undertaken, based on oncogenicity grounds, although the use pattern and single rate of application do not trigger the requirement for this study.

2. Fish embryo larvae study (partial lifecycle) (72-4)

Is required

3. Daphnia lifecycle (chronic daphnia) (72-4)

Is also required

4. Fish (72-5) and Aquatic Organism Accumulation (72-6)

EEB will be guided by EAB on requirement for these studies. Will not be required if EAB grants ICI a waiver for undertaking fish accumulation (165-4).

5. Acute Toxicity to Estuarine and Marine Organisms (72-3)

ICI believes marine/estuarine studies would not be required, based on general toxicity of this class of herbicides and use pattern. EEB are not in a position to tell ICI yet whether this would be a requirement: this depends on EPA's review of acute tests and fish chronic studies.

6. Non target area phytotoxicity

This study (tier II) is now a standard requirement. Protocol can be obtained from Charlie Lewis at the Agency.

In answer to Geoff Willis' question, if there were any other areas which ICI should have asked about, Norm Cook suggested that a honey bee study, whilst not required by the proposed use pattern would be a useful study to do.

As a general comment, Norm Cook said that ICI must obtain mean measured residues of acetochlor in water when undertaking these toxicity studies, and to say that there was a problem in measuring would only lead to rejection of the study.