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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

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OFFICE OF
PESTICIDES AND TOXIC
SUBSTANCES

MEMORANDUM

SUBJECT: Data Requirements of Acetochlor

FROM: Doug Urban, Acting Chief
Ecological Effects Branch
Environmental Fate and Effects Division

TO: Joanne Miller, PM-23
Fungicide-Herbicide Branch
Registration Division (H7505)

Douglas J Urban
3/16/92

The Ecological Effects Branch has reviewed the data requirements for acetochlor (Shaughnessy No. 121601) for two different companies under section 3 registration. They are as follows:

<u>Study Type</u>	<u>Monsanto</u>	<u>ICI</u>
71-1 Acute Avian Oral	core	core
71-2 Acute Avian Diet	core	core
71-4 Avian Reproduction--1	outstanding	in review
72-1 Acute Fish Toxicity	core	core
72-2 Acute Aquatic Invertebrate	core	core
72-3 Estuarine/marine Toxicity-1	outstanding	in review
72-4 Early Life Stage Fish or Invertebrate Life Cycle-2	outstanding	in review
123-1 Seed Germination-3 Seedling Emergence Vegetative Vigor	outstanding	outstanding
123-2 Growth & Reproduction of Aquatic Plants-3	outstanding	outstanding
201-1 Drift Study- Droplet Size-4	not requested	outstanding
202-1 Drift Study- Aerial Field-4	not requested	outstanding

- 1 Due to multiple application and persistence
- 2 Due to LC₅₀ value is less than 1 mg/L for trout.
- 3 Due to this chemical being a herbicide
- 4 Due to aerial application

These two different companies (Monsanto and ICI) are seeking registration without cooperation due to conflicts over ownership of the chemical. We are required to have two different sets of data reviewed by two different reviewers with a "blind eye" towards the other companies' data. There is currently a conflict in the data requirements in that ICI has been requested to have drift studies and Monsanto has not had that request communicated to them.

According to 11-26-90 memo from RD, RD has indicated that "we should ensure that the same requirements be imposed on both companies for registration of this compound" and "someone (meaning us) would be responsible to see that both registrants have the same data requirements". Both companies have indicated that aerial application will be used. Therefore, Monsanto must provide drift data; 201-1 and 202-1.

If you have any questions, please do not hesitate to contact Mike Davy at 305-7081.