TO:      Taylor/Pelkel Team: 25
         Registration Division

THRU:    Raymond W. Matheny, Head, Section I
         Ecological Effects Branch
         Hazard Evaluation Division

THRU:    Clayton Bushong, Chief
         Ecological Effects Branch
         Hazard Evaluation Division

SUBJECT: Three Paclobutrazol Submissions Concerning A Mallard LD50 Study
         and Product Labeling (EPA Reg. No. 10182-IE, 10182-EDGU, and
         10182-TI).

The subject study did not meet the guideline requirement (see EEB review
dated 2/15/83). In order to repair this study, the company was asked to report
the precise age of the birds tested and explain the use of "chick" diet
on "young adult" birds. The company reported that the precise age of the
birds is unknown. However, ICI stated, "by calculation from the egg production
period of birds of this type it is possible to say that they were in the
age range of 14-20 weeks." Concerning the "chick" diet the following
response was provided:

"The use of the word "chick" in this case was an abbreviation for chicken
and as such was a term used to cover a wide age range other than the period
prior to or after egg production. The diet used in this study was designed to
ensure that no medicaments were added and provided the correct nutrient
balance. The fact that the diet was satisfactory may be judged by the
mortalities recorded, bird health and weight gains recorded."

These explanations are adequate. The subject study further identified by
the Acc. No. 248689 and authored by Ross, et.al, (1979) meets the guidelines
requirements.

The revised label "Environmental Hazard" section for Reg. No. 10182-IE is
adequate for the intended use.

Dennis J. McLane
Wildlife Biologist
<table>
<thead>
<tr>
<th><strong>FILE OR REG. NO.</strong></th>
<th>10152-TT</th>
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<tr>
<td><strong>PETITION OR EXP. PERMIT NO.</strong></td>
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<td><strong>DATE OF SUBMISSION</strong></td>
<td>10/1/84</td>
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<tr>
<td><strong>DATE RECEIVED BY MED</strong></td>
<td>10/5/84</td>
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<tr>
<td><strong>RD REQUESTED COMPLETION DATE</strong></td>
<td>1/23/85</td>
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<td><strong>EEB ESTIMATED COMPLETION DATE</strong></td>
<td>1/16/85</td>
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<tr>
<td><strong>RD ACTION CODE/TYPUE OF REVIEW</strong></td>
<td>116/New Chemical</td>
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<tr>
<td><strong>TYPE PRODUCT(S):</strong></td>
<td>I, D, H, F, N, R, S</td>
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<tr>
<td><strong>Herbicide</strong></td>
<td></td>
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<td><strong>DATA ACCESSION NO(S).</strong></td>
<td></td>
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<td><strong>PRODUCT MANAGER NO.</strong></td>
<td>R. Taylor (25)</td>
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<tr>
<td><strong>PRODUCT NAME(S)</strong></td>
<td>Clipper 50W Tree Growth Retardant</td>
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<td><strong>COMPANY NAME</strong></td>
<td>ICI Americas, Inc.</td>
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<td><strong>SUBMISSION PURPOSE</strong></td>
<td>Registrant response to EEB review of avian studies</td>
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<td><strong>SHOAUGHNESSEY NO.</strong></td>
<td>125601</td>
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<td><strong>CHEMICAL &amp; FORMULATION</strong></td>
<td>Z-A.I.</td>
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<td>(2RS,3RS)-1-(4-chloro phenyl)-4,4-dimethyl-2-(1H,1,2,4-</td>
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<td>triazol-1-yl) pentan-3-0l</td>
<td>50</td>
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**EEB BRANCH REVIEW**

**DATE:** IN 10/9/84  OUT 10/29/84

**FILE OR REG. NO.** 101B2-EUP-GU

**PETITION OR EXP. PERMIT NO.**

**DATE OF SUBMISSION** 10/1/84

**DATE RECEIVED BY HED** 10/5/84

**RD REQUESTED COMPLETION DATE** 12/24/84

**EEB ESTIMATED COMPLETION DATE** 12/17/84

**RD ACTION CODE/TYPE OF REVIEW** 701/EUP

**TYPE PRODUCT(S):** I, D, H, F, N, R, S  *Herbicide*

**DATA ACCESSION NO(S).**

**PRODUCT MANAGER NO.** R. Taylor (25)

**PRODUCT NAME(S)** Parlay 50WP

**COMPANY NAME** ICI Americas, Inc.

**SUBMISSION PURPOSE** Registrant response to EEB review of avian studies

**SHAUGHNESSEY NO.** 125601 **CHEMICAL & FORMULATION**

(2RS,3RS)-1-(4-chlorophenyl)-4,4-dimethyl-2-

(1H-1,2,4-triazol-1-yl) propan-3-01

50
FILE OR REG. NO. 10182-1E

PETITION OR EXP. PERMIT NO.

DATE OF SUBMISSION 10/1/84

DATE RECEIVED BY RED 10/4/84

RD REQUESTED COMPLETION DATE 1/22/85

EEB ESTIMATED COMPLETION DATE 1/15/85

RD ACTION CODE/TYPE OF REVIEW 116 New Chemical

TYPE PRODUCT(S): I, D, H, F, N, R, S Herbicide

DATA ACCESSION NO(S).

PRODUCT MANAGER NO. R. Taylor (25)

PRODUCT NAME(S) Bonzai

COMPANY NAME ICT Americas, Inc.

SUBMISSION PURPOSE Response to previous EEB review plus submission of revised label

SHAUGHNESSY NO. CHEMICAL & FORMULATION Z.A.I.

125601 (2RS, 3RS)-1-(4-chlorophenyl)-4,4-dimethyl-2-(1H-1,2,4-triazol-1-yl) pentan-3-ol