

US EPA ARCHIVE DOCUMENT

Shaughnessy No.: 128857

Date Out EAB: MAR 5 1986

Signature: 

TO: Henry M. Jacoby
Product Manager #21
Registration Division (TS-767C)

FROM: Emil Regelman, Chief
Review Section #3
Exposure Assessment Branch
Hazard Evaluation Division



Attached please find the environmental fate review of:

Reg./File No.: 707-EUP-RNL

Chemical Name: SYSTHANE

Type Product: Fungicide

Product Name: RH-3866

Company Name: Rohm & Haas

Purpose : Clarification of several issues, and new information to satisfy EUP requirements for apples, grapes and perennial grasses for seed.

ACTION CODE(s): 711

EAB # (s): 6087

Date Received: 11/29/85

TAIS Code: 52

Date Completed: MAR 5 1986

Total Reviewing Time: 3.5 Day

Monitoring requested: _____

Monitoring voluntarily Done: _____

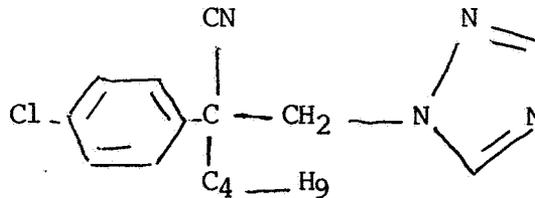
Deferrals To:

_____ Ecological Effects Branch

_____ Residue Chemistry Branch

_____ Toxicology Branch

1. Chemical: RH-3866 (Systhane)
butyl-[chlorophenyl-1-H-1,2,4-triazole propanenitrile



2. TEST MATERIAL:

None

3. STUDY/ACTION TYPE:

EUP (fungicide) on apples, grapes, and perennial grasses for seed-
(letter from registrant giving required information concerning previous
studies submitted)

4. STUDY IDENTIFICATION:

No new studies--only additional information e.g., explanation of laboratory
"ambient" temperature.

5. REVIEWED BY:

John H. Jordan, Ph.D.
Microbiologist
EAB/HED/OPP

Signature

Date

3/5/86

6. APPROVED BY:

Emil Regelman, Chief
Review Section 3
EAB/HED/OPP

Signature

Date

MAR 5 1986

7. CONCLUSIONS:

The EUP requirements (hydrolysis, aerobic soil metabolism, leaching,
rotation crop, and fish accumulation) have been satisfied for apples,
grapes and perennial grasses for seed. However, data gaps exist for full
registration.

Hydrolysis

Previously the reported temperatures were "ambient." The registrant's
November 26, 1985, TABLE II, specified laboratory ambient temperature at

22° C + 2.3°C. This new information answers our previous question concerning "ambient" temperature. The hydrolysis study satisfies the requirement for full registration.

Aerobic Soil Metabolism

We have a clarification of ambient temperature in the registrant's 11/26/85 letter, and the study is satisfactory for the EUPs. However, for full registration of the terrestrial crop and noncrop uses, decline of parent and formation and decline of degradates must be established or the study continued for 1 year, whichever comes first.

Leaching/adsorption desorption

Batch equilibrium

EAB previously objected to the study because adsorption appeared to be independent of organic matter. This objection is not valid and we agree with the registrant that the study is acceptable.

Soil column study

In the 9/18/85 review, EAB accepted the items as listed in a,b,c,d on page II-D of the registrant 11/26/85 letter. In response to the registrant's question on page II-D, information covering the major metabolite (triazole) will satisfy the mobility requirement for full registration.

Confined accumulation

Because the registrant removed the wheat crop use, there is no requirement (under the present use pattern) for rotation data.

Aqueous photolysis

EAB agrees that the above data requirement is not mandatory for the EUP. However, the registrant will correct deficiencies in the study before submission for full registration.

Field soil dissipation

We acknowledge that the above data are not required for the EUP. When existing deficiencies are addressed, the registrant must send EAB a reference copy of the analytical method, along with the completed study for consideration of full registration.

8. RECOMMENDATIONS:

EUP requirements for apples, grapes and perennial grasses for seed have been satisfied. It is recommended that the EUP be granted.

9. BACKGROUND:

Introduction

- A. Following the 9/11/85 review/evaluation of several studies, the registrant wrote a letter asking for clarification of apparent issues. Rohm and Haas sent additional information requested by EAB reviewers. (letter attached to original package and EAB file copies).

This action is a response to the registrant's questions and the new information (data) requested by EAB.

B. Directions for use

The proposed label should be submitted to EAB for review.

10. DISCUSSION OF INDIVIDUAL TESTS OR STUDIES:

No studies submitted--new information concerning procedures was sent by the registrant.

11. COMPLETION OF ONE-LINER:

One-liner has not been completed to date.

12. CBI APPENDIX:

No CBI included in the package except the studies in the original package

Page _____ is not included in this copy.

Pages 5 through 12 are not included in this copy.

The material not included contains the following type of information:

- Identity of product inert ingredients
 - Identity of product impurities
 - Description of the product manufacturing process
 - Description of product quality control procedures
 - Identity of the source of product ingredients
 - Sales or other commercial/financial information
 - A draft product label
 - The product confidential statement of formula
 - Information about a pending registration action
 - FIFRA registration data
 - The document is a duplicate of page(s) _____
 - The document is not responsive to the request
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The information not included is generally considered confidential by product registrants. If you have any questions, please contact the individual who prepared the response to your request.
