FEB 4 1988

FER 4 1988

MEMORANDUM

SUBJECT: Karate Data Requirements for EXAMS

FROM: Candy Brassard
Ecological Effects Branch
Hazard Evaluation Divsion (TS 769-C)

Candy Brassard 2/3/88

THRU: Douglas J. Urban
Head-Section III
Ecological Effects Branch
Hazard Evaluation Division (TS-769-C)

Douglas J Urban 2/3/88

THRU: Henry T. Craven
Acting Chief
Ecological Effects Branch
Hazard Evaluation Division (TS-769-C)

Henry T Craven 2/4/88

TO: Paul Schuda
Chief
Exposure Assessment Branch
Hazard Evaluation Division (TS-769-C)

The Ecological Effects Branch (EEB) is requesting that the data needed to conduct an Exposure Analysis Modeling System (EXAMS), i.e. hydrolysis, aqueous photodegradation, and anerobic soil metabolism be forwarded to our branch. If valid data are not available, then EEB requests that your branch request these data from the registrant.

Since EEB conducted the Simulator for Water Resources in Rural Basins (SWRRB), we would accept the responsiblity for conducting the EXAMS. But the necessary information are lacking, as stated by EEB in the review of Karate on cotton and soybeans which was completed and forwarded to the Registration Division on November 16, 1987.

These data requirements have been satisfied by other synthetic pyrethroid manufacturers, even with the water solubility in the ppb range.

A mesocosm study on Karate, which has not yet been submitted for review, may have adequate information to calculate the exposure for these use patterns. However, these data would have to be reviewed and evaluated.

Until these data are received, EEB will be unable to complete a hazard assessment since we will not be able to compare the level of toxicity to expected exposure.

If we can be of further assistance, please feel free to contact Candy Brassard, 557-0019, the EEB staff member assigned to Karate.

cc: George LaRocca/RD
cc: Ricahrd Lee/EEB