

US EPA ARCHIVE DOCUMENT

JUL 11 1988




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

MEMORANDUM

SUBJECT: GX-071

OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

FROM:   
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Ecological Effects Branch  
Hazard Evaluation Division (TS-769C)

TO: Phillip Hutton, PM 17  
Insecticide-Rodenticide Branch  
Registration Division (TS-767C)

As per your request, EEB has reviewed the registrant's letter dated June 21, 1988 addressing the acute terrestrial and aquatic studies in a previous EEB review. After reviewing the registrant response, EEB has the following comments:

1. Bobwhite quail LC50

This study can be upgraded to core status, providing the registrant accepts the LD50 value as 380 mg/kg instead of 473.76 (357-2338) mg/kg.

2. Rainbow trout LC50

This study remains supplemental and cannot be upgraded to core status for the following reasons:

- The test material was not in solution;
- The temperature was 17.5 -24 °C instead of 10-15 °C; and
- The test material was insoluble in water and the registrant was unable to produce a stable solution. Also the registrant did not mention the name of organic solvent used in the study.

EEB cannot determine the exact exposure concentration of GX-071 to rainbow trout because the test material was not in solution nor was the test solution analyzed for GX-071. The following organic solvents are acceptable for use in an aquatic study:

- Dimethyl formamide
- Triethylene glycol
- Methanol
- Acetone
- Ethanol

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### 3. Daphnia pulex LC<sub>50</sub>

If the registrant submits the water analysis data, along with procedure used and they are found acceptable to support registration, then this study can be upgraded to core.

- Temperature was 24 °C instead of 17-21 °C;
- Test vessel volume was 1 oz instead of 200-300 ml; and
- Test vessel material type was plastic containers instead of glass or stainless steel.

#### Conclusions:

##### A. Adequacy of Data

1. The bobwhite quail acute oral LD<sub>50</sub> study does fulfill the requirement in support of registration.

##### B. Inadequacy of Data

1. The 96-hour LC<sub>50</sub> for rainbow trout does not fulfill the in support of registration.

##### C. Study Pending Additional Data

1. The 48-hour LC<sub>50</sub> for Daphnia pulex pending result of acceptable water analysis data.