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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES**MEMORANDUM**

Subject: I.D. No.: 129099. Imidacloprid. Evaluation of 6(a)(2) data on imidacloprid impurities.

Tox. Chem. No. 497E
PC Code No. 129099
DP Barcode Nos. D222899, D222958
Submission Nos. S500234, S500321

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5/24/96

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I. CONCLUSIONS

The submitted data do not alter the toxicity profile of currently registered imidacloprid technical or formulations, and a detailed review of these data are not warranted at this time.

II. ACTION REQUESTED

TB-1 received for possible evaluation acute toxicity and mutagenicity data on two imidacloprid impurities as follows:

Document Title	MRID
Submission Letter, dated November 8, 1995	43845100
NTN 33893 (Proposed c.n. Imidacloprid). Toxicological Assessment of Qualitative and Quantitative Differences in the Range of By-Products in the Toxicology Sample and Commercial Grades of Active Ingredient	43845101
NTN 33893 CNS (Proposed c.n. Imidacloprid). Study for Acute Oral Toxicity in Rats	43845102
NTN 33893 AMP (Proposed c.n. Imidacloprid). Study for Acute Oral Toxicity to Rats	43845103
GAW 727 (NK7). Salmonella/Microsome Test	43845104
NTN 33893 AMP. Salmonella/Microsome Test	43845105
Nitroguanidine. Summary Assessment of Toxicological Data	43845106
Submission Letter, dated January 6, 1996	43906800
NTN 33893 (Proposed c.n. Imidacloprid). Occurrence and Assessment of Quantitative Differences in the Range of Certain By-Products (PEDA, DIPEDA) in the Toxicology Sample and Commercial Grades of Active Ingredient	43906801

III. RESULTS/DISCUSSION

The memo dated 1/25/96 indicates that two impurities (PEDA and DIPEDA) present in imidacloprid low concentrations have weak mutagenic potential. The data, however, show that the technical, when tested with the impurities present, did not exhibit mutagenic effects, regardless of the manufacturing process.

Acute toxicity is within the same order of magnitude for both the commercial grade and the toxicology samples of imidacloprid. Therefore, TB-1 has declined detailed review of these documents at this time because the data presented will not alter the toxicity profile (including RfD) of imidacloprid technical or its formulations currently registered.