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

OFFICE OF
PESTICIDES AND TOXIC
SUBSTANCES

MEMORANDUM

May 9, 1991

SUBJECT: Status of Copper Compounds
FROM: *James W. Akerman*
James W. Akerman, Chief
Ecological Effects Branch
Environmental Fate and Effects Division H7507C

TO: Carol Peterson
Reregistration Branch
Special Review and Reregistration Division H7508W

The Ecological Effects Branch has reviewed their Copper compound files to determine the status of the data requirements, whether copper compounds are eligible for reregistration, and whether special review can be recommended. In response to the memorandum from Allan Abramson to Anne Barton dated April 3, 1991 the following is provided.

Status of EEB Data Requirements

James A The EEB has completed review of all data submitted by the Copper Task force. This includes avian reproduction studies and ~~a~~ monitoring study for aquatic incidents and residue monitoring.

The avian reproduction studies were addressed in a memorandum from James Akerman to Phil Hundeman dated November 1, 1990. None of the studies fulfilled the guideline requirement. Due to the nature of the deficiencies, it is not possible to complete a reregistration risk assessment for any uses or use rates using the results of these studies. The studies did not provide a valid No Observed Effect Level (NOEL). The EEB is unable to determine what uses and use rates would be unlikely to result in avian reproduction impact. The four studies previously requested must be repeated for all registered uses of all copper compounds.

The monitoring study has been reviewed and discussed in a memorandum from James Akerman to Lois Rossi dated February 4, 1991. Based on EEB's evaluation, the study did not fulfill the



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requirement because of lacking information. This lacking information was identified in the Data Evaluation Report attached to the memorandum. Without this additional information, EEB is unable to fully evaluate the effects of copper on aquatic organisms (especially fish) from all aquatic and terrestrial uses.

Reregistration Eligibility

The EEB is unable to support a decision to re-register copper compounds at this time because a risk assessment cannot be performed. Without this risk assessment, it is not possible to conclude minimal hazard or to quantify the hazard expected.

The EEB has requested that EFGWB use the environmental fate information provided for copper compounds and provide estimates of exposure for various uses and use rates. See memorandum from James Akerman to Hank Jacoby dated February 15, 1991. When these EEC's have been provided, and sufficient information on the monitoring study provided, the EEB will be able to complete an aquatic risk assessment.

Special Review

While EEB cannot conclude safety from the use of copper, neither is there sufficient information to recommend special review.

Summary

The additional information, including new avian reproduction studies, and information on the aquatic monitoring study must be provided and reviewed before EEB can recommend reregistration or special review. An aquatic EEC from EFGWB is also necessary for completion of an aquatic risk assessment. If there are questions, please contact Dan Rieder.