



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

MEMORANDUM

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

TO: Spencer Duffy, Special Review
Registration Division, TS-767c

THRU: *H.T. Craven*
Harry Craven
Section Head #4
Ecological Effects Branch
Hazard Evaluation Division, TS-769c

THRU: *Clayton Bushong*
Clayton Bushong, Chief
Ecological Effects Branch
Hazard Evaluation Division, TS-769c

SUBJECT: Fonofos Standard - Branch Chief Review

We have reviewed your recent draft of the regulatory chapter and have the following comments:

- (1) Existing label statements should be changed as follows:

Manufacturing Use Labels

"This pesticide is toxic to fish and wildlife. Do not discharge into lakes, streams, ponds or public waters unless in accordance with an NPDES permit. For guidance contact your regional office of the EPA."

End Use Products Outdoors

"This pesticide is toxic to fish and wildlife. Birds feeding in treated areas may be killed. Pick up or cover granules if spills occur. Runoff from treated areas may be hazardous to fish in neighboring areas. Do not apply directly to water or wetlands. Do not contaminate water by cleaning of equipment or disposal of waste."

- (2) It is currently HED practice to indicate on the Data Requirements tables whether studies entirely fulfill or partially fulfill testing requirements. I have added this information to the attached tables.

Richard Balcomb

Richard Balcomb
Wildlife Biologist
Ecological Effects Branch
Hazard Evaluation Division, TS-769c

TABLE A
 GENERIC DATA REQUIREMENTS FOR FONOFOS

Data Requirements	Composition	Use		Does EPA Have Data To Satisfy This Requirement? (Yes, No or Partially)	Bibliographic Citation	Must Additional Data Be Submitted Under FIFRA Section 3(c)(2)(B)? ^{3/}
		1/	2/			
<u>\$158.145 Wildlife and Aquatic Organisms</u>						
<u>AVIAN AND MAMMALIAN TESTING</u>						
71-1 - Avian Acute LD50	TGAI		A, B, H	Yes	00090861 * 00092027 *	No
71-2 - Avian Dietary LC50	TGAI		A, B, H	Yes	00022923 * 00090820 *	No
71-3 - Wild Mammal Toxicity	TGAI		A, B, H	Not Required		
71-4 - Avian Reproduction	TGAI		A, B, H	Not Required		
71-5 - Simulated and Actual Field Testing - Mammals and Birds	TEP		A, B, H	Yes	00090849 * * 00090882 * * 00090862 * * GS-0105-001 * GS-0105-002 *	No
<u>AQUATIC ORGANISM TESTING</u>						
72-1 - Freshwater Fish LC50	TGAI		A, B, H	Yes	00052064 * 00090820 * GS-0105-003 *	No
72-2 - Acute LC50 Freshwater Invertebrates	TGAI		A, B, H	No		Yes
72-3 - Acute LC50 Estuarine and Marine Organisms	TGAI			Not Required		
72-4 - Fish Early Life Stage and Aquatic Invertebrate Life-Cycle	TGAI		A, B, H	No		Yes

TABLE A
 GENERIC DATA REQUIREMENTS FOR FOMJFOS

Data Requirement	Composition	Use <u>1/</u> Pattern <u>2/</u>	Does FPA Have Data To Satisfy This Requirement? (Yes, No or Partially)	Bibliographic Citation	Must Additional Data Be Submitted Under FIFRA Section 3(c)(2)(B)? <u>3/</u>
158.145 Wildlife and Aquatic Organisms (continued)					
72-5 - Fish - Life-Cycle	TCAT	A, B, H	Not Required		
72-5 - Aquatic Organism Accumulation	TCAT, PAI OR Degradation Product	A, B, H	Not required.		
72-7 - Simulated or Actual Field Testing - Aquatic Organisms	TFP	A, B, H	Reserved <u>4/</u>		

TABLE A
GENERIC DATA REQUIREMENTS FOR FONOPRS

158.145 Wildlife and Aquatic Organisms
(continued)

- 1/ Composition: TGA1 = Technical grade of the active ingredient; PAI = pure active ingredient; TFP = Technical end-use product;
- 2/ The use patterns are coded as follows: A=Terrestrial, Food Crop; B=Terrestrial, Non-Food Crop; C=Aquatic, Food Crop; D=Aquatic, Non-Food; F=Greenhouse, Food Crop; G=Greenhouse, Non-Food; H=Domestic Outdoor; I=Indoor.
- 3/ Data must be submitted no later than December, 1986.
- 4/ ~~See Environmental-Fate § 158.130: The study submitted was done on tap-water not sterile-water as required.~~
- 4/ ~~Reserve pending results of 72-4 and outstanding environmental fate data.~~

* = Study satisfies EPA testing requirements

* * = Study does not satisfy EPA testing requirements
but is considered useful information
and may in conjunction with other data
fulfill requirements.