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

8-7-92

7 AUG 1992

3073

EFGWB #: 92-0701
PC Code: 75003
DP Barcode: 176302

MEMORANDUM:

Subject: Review of Phase IV List C Package for Sodium Fluoroacetate

From: Patricia Ott, Chemist
Environmental Chemistry Review Section #1
EFGWB/EFED (H7507C)

Through: Henry Jacoby, Branch Chief
Environmental Fate and Ground Water Branch
Environmental Fate and Effects Division (H7507C)

Paul J. Mastradone, Ph.D., Section Chief
Environmental Chemistry Review Secton #1
EFGWB/EFED (H7507C)

To: Barbara Briscoe, Product Manager #51
Special Review and Reregistration Division (H7508W)

The Phase IV review package for List C chemical, Sodium Fluoroacetate, was provided to EFED on 3/31/92. The package consisted of a LUIS report, SRRD/GCSB Transmittal Sheet for Parts B/C/D, Draft Addendum Report (3/31/93), Phase 3 Chemical Response Worksheets, registrant letter (8/2/90), MRID #416317-03 (storage stability), and MRID #93099003 (Physical and Chemical Characteristics).

Previously, EFGWB imposed no data requirements (for usage category Terrestrial Non-Food) but said that laboratory metabolism studies may be required upon further review of application information (SRRD/GCSB Transmittal Sheet dated 5/29/90).

An examination of EFGWB reviews and correspondence indicates a lack of responsiveness on the part of some registrants with regard to submitting agreed upon data for this chemical. A brief history of EFGWB's position and recommendations is:

Review	EFGWG Recommendations
Section 18, Montana Department of Agriculture to use chemical as a grain bait to control ground squirrels (EAB # 5370, dated 4/8/85)	Use of 1080 as a grain bait was prohibited in 1972. EAB has no fate data.
Section 18,, South Dakota--prairie dogs (EAB #5833, dated 8/23/85)	Per Mr. Schatzow's instructions, the Section 18 was not reviewed
Review in response to 3(c)(2)(B) data call-in (EAB #70154, 2/17/87)	The currently submitted 14 studies are not responsive to the data call-in. The State of California appears to have violated the "good faith" agreement of 1975 to fulfill data requirements.
Working Document for Denver 1987 Meeting (a meeting was held between Jack Moore and several western states (CA, CO, OR, WY, NM)	EAB required 9 studies and, apparently, the states agreed to submit data.
EUP, State of Montana to evaluate reduced concentration of 1080 as grain bait (EAB #80474, 5/4/88)	EAB non-concurred, due to lack of data
Hydrolysis Data submitted by the State of California (EAB #80816, 6/10/88)	Submission was "neither a study nor an abstract". "EAB strongly recommends the immediate issuance of a NOITS letter.

The LUIS report lists only one use: "impregnated collar/tag", which is considered an indoor use. There is an endangered species restriction on the label. The maximum application rate is 30.4 gm/animal and the number of collars/acre of pasture is limited ("do not use >20 collars/100 acres of pasture or >50 collars for 101 to 640 acres of pasture or >100 collars for 641 to 10,000 acres of pasture".

EFGWB has no environmental fate data for this chemical. The LUIS report does not mention the grain bait for ground squirrel control use, although the branch file contains reviews (6/10/88 and 5/4/88), which discuss this use.

Assuming the only currently registered use is on impregnated collars, resulting in limited usage and environmental exposure, the following Environmental Fate data requirements are being imposed at this time: hydrolysis.