

2-5-82

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE: FEB - 5 1982

SUBJECT Conditional registration of AMDRO (EPA Reg. No. 241-260)
for use in cropland.

FROM Charles A. Bowen, Fisheries Biologist *CAS*
Ecological Effects Branch, HED (TS-769)

TO George LaRocca, PM-15
Registration Division, OPTS (TS-767c)

THRU: Ray Matheny, Head Section 1 *RWM*
Ecological Effects Branch, HED

THRU: Clayton Bushong, Chief *CB*
Ecological Effects Branch, HED

The Ecological Effects Branch is unable to conduct a hazard assessment for Amdro fire ant insecticide due to poorly defined use site(s). The registrant's proposed product label states that Amdro can be applied to cropland. Such a statement is ambiguous and prohibits this Branch from performing an incremental risk assessment since the extent of target acreage(s), date and duration of exposure(s), and the types of non-target organisms that could be exposed to Amdro residues cannot be determined.

The Ecological Effects Branch will reinitiate the review of this product when the registrant properly identifies the crop(s) receiving applications of Amdro.

ROUTING AND TRANSMITTAL SLIP

TO: (Name, office symbol, room number, building, Agency/Post)

1. Chuck Bowen

Action	File	Note and Return
<input checked="" type="checkbox"/> Approval	For Clearance	Per Conversation
<input type="checkbox"/> As Requested	For Correction	Prepare Reply
<input type="checkbox"/> Circulate	For Your Information	See Me
<input type="checkbox"/> Comment	Investigate	Signature
<input type="checkbox"/> Coordination	Justify	

REMARKS

Clayton and I discussed your Feb. 5, 1982 memo and agreed that "you could make a TFA using worst case situation with the attached crop group listings. I've also attached a list of the June 1981 EIS by USDA on rice and to give you additional information on the present spread of the TFA crop & non-crop areas where it could be applied and endangered species. Also could be applied and endangered species.

DO NOT use this form as a RECORD of approvals, concurrences, disposals, clearances, and similar actions

FROM: (Name, org. symbol, Agency/Post)
George Labocca PM15

Room No.—Bldg.

Phone No.

OPTIONAL FORM 41 (Rev. 7-76)
 Prescribed by GSA
 FPMR (41 CFR) 101-11.206

5041-102

* GPO : 1981 O - 341-529 (25)

Date: *1/18/76*

ROUTING AND TRANSMITTAL SLIP

TO: (Name, office symbol, room number, building, Agency/Post)	Initials	Date
1. <i>118401</i>		
2. <i>Tom Rushley</i>		
3.		
4.		
5.		

Action	File	Note and Return
Approval	For Clearance	Per Conversation
As Requested	For Correction	Prepare Reply
Circulate	For Your Information	See Me
Comment	<input checked="" type="checkbox"/> Investigate	Signature
Coordination	Justify	

REMARKS

I spoke to Bowen regarding their request and suggested that he use coop-grouping designations as potential areas for Amdro use. He more or less agreed but would discuss with Norm look first tomorrow. If you don't hear from Norm give him a call later in the afternoon. A plausible way to approach the incremental risk is to estimate amt.

DO NOT use this form as a RECORD of approvals, concurrences, disposals, clearances, and similar actions

FROM: (Name, org. symbol, Agency/Post)	Room No.—Bldg.
<i>George</i>	Phone No.