

12-21-94



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

MEMORANDUM

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

SUBJECT: Miles Inc. request to eliminate the application window restriction of July 1 and to add aerial application for Tebuconazole

FROM: Anthony F. Maciorowski, Chief  
Ecological Effects Branch  
7507C

*Douglas J. L. [Signature]*  
12/21/94

TO: Susan Lewis/Denise Greenway  
Registration Division

Miles Inc. requested the removal of the application window restriction and the addition of aerial application to the label of Folicur 3.6 F. Folicur is applied at a rate of 0.225 lbs ai/acre. It is applied four times with an application interval of 14 days.

The application window restriction was originally included to protect fish (shortnose sturgeon) during their spawning season and because Folicur is used with IPM and can be restricted to mid season. This application window was part of the Mitigation Proposal presented by Miles (December, 1993) and accepted by EPA. Calculation of the EEC by a screening model (May, 1994), provided an EEC of 0.0098 ppm. This model took into consideration the Koc, aerobic soil metabolism rate and spray drift. The level of concern for chronic effects on fish is not exceed, the Risk Quotient is 0.81 ( $RQ = EEC/NOEL = 0.0098/0.012 = 0.81$ ). Based on this risk quotient, the effects to fish (endangered and non endangered) are minimal and the application window can be removed. However, we do not know how the IPM is going to be affected by the removal of the application window.

HTC  
5/18/95

The prohibition of aerial application was another mitigation measure presented in the Mitigation Proposal. It was included to eliminate the drift to aquatic areas. The calculated maximum EEC at the end of the first season is 0.00703 ppm. At the end of the third year (second season) the EEC is 0.0101 ppm. The risk quotient at the end of the first year is 0.6. The risk quotient at the end of the third year is 0.8. The level of concern is not exceeded for either the first or third year.



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The risk to birds resulting from aerial application is minimal. Assuming 5% drift, 4 applications with a 14 days interval, the maximum residue in short grass is 9.5 ppm. The risk quotient is 0.002. No acute risk to birds are expected from the aerial application of tebuconazole. No chronic risks are expected. Assuming a worst case scenario of maximum residues in short grass, the risk quotient is 0.06. The levels of concern are not exceeded for the acute or chronic avian endpoints.

Based on the information available, the levels of concern were not exceeded for terrestrial and aquatic organisms as a result of aerial application. Aerial application can be added to the label. It should be mentioned that a mesocosms is in review and that after the review the risk assessment might change.

If you have any questions please contact Conchi Rodriguez (308-2805) or Harry Craven (305-5320).

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