

7-10-91



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

MEMORANDUM

OFFICE OF
PESTICIDES AND TOXIC
SUBSTANCES

SUBJECT: Comments on fish and wildlife concerns resulting from the use of Telone.

FROM: Douglas J. Urban, Acting Branch Chief,
Ecological Effects Branch, EFED

JUL 10 1991

TO: Lisa Engstrom, Review Manager
Special Review Branch, SRRD

We have examined the existing data base for Telone (1,3-dichloropropene) and we have reviewed and accepted as core (i.e. satisfies guideline requirements) one study since 1980. All other studies were conducted in the 1970's, although some were rereviewed in 1985. After looking through the data base we realize that it will be difficult to make a judgement on risk to fish and wildlife without up to date studies. The method of application which involves the fumigant to be disced 4 to 6 inches into the soil would limit exposure to birds, somewhat. However, there are many species of birds that probe into the soil for food and almost all mammal species that may be present would be burrowing into the soil thus the potential of exposure to these birds and mammals is high. Also, the treated area would be compacted and irrigated after application to prevent loss due to volatilization. This could lead to exposure of fish and aquatic invertebrates and we have very little toxicity data for these types of organisms (none of it current). We think effects of telone on wildlife should be considered and a risk assessment be completed when a current set of data has been submitted to the Agency for review. This data should include the following:

- Two avian dietary toxicity studies, one with the mallard duck and one with the bobwhite quail. The avian acute oral study from 1982 (EPA accession # 261149) appears adequate for an LD50 study.
- Two fish 96-hour LC50 studies, one with the bluegill sunfish and one with the rainbow trout.
- An invertebrate 48-hour LC50 study with Daphnia magna.

In addition, chronic data may be required depending upon results of the above studies and data from EFGWB.





United States Department of the Interior

FISH AND WILDLIFE SERVICE

WASHINGTON, D.C. 20240

ADDRESS ONLY THE DIRECTOR,
FISH AND WILDLIFE SERVICE

JAN 09 1987

Mr. Bruce A. Kapner
Risk/Benefit Section
Special Review Branch
Registration Division (TS-767C)
U.S. Environmental Protection Agency
Washington, D.C. 20460

Dear Mr. Kapner:

Thank you for giving the Service the opportunity to comment on the Federal Register Notice that initiates the Special Review for 1,3-dichloropropene (Telone). According to the Federal Register Notice, Telone is under review because of its oncogenic properties in rats and mice.

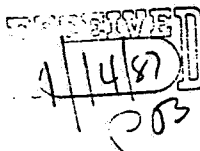
The downwind oncogenicity risk is estimated for humans, but the risk to wildlife is not addressed. Although the risk to humans is estimated to be relatively low, wildlife may have considerably greater exposure because they may live in the immediate vicinity of the fumigated crop and have a greater likelihood of ingesting or breathing recently fumigated material. The interim risk reduction measures will do little to protect wildlife.

I recommend your serious consideration of the effects of Telone on wildlife in your Special Review of this fumigant.

Sincerely,

Ronald E. Lamberton

Assistant DIRECTOR



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JUN 24 89

NOTE TO: Ruth Allen

FROM:

Lisa Engstrom

Lisa Engstrom
6/24

HED and BEAD are currently responding to comments submitted to the 1,3-dichloropropene PD 1 from 1986. While most comments deal with benefits and human health concerns, there is one comment (attached) which deals with wildlife. (EFED has been reviewing issues related to groundwater contamination). Do you know if anyone in EFED who addresses wildlife issues has been assigned to the 1,3-D team? If not, is there anyone who could review the data on 1,3-D to respond to this comment?

Thank you for your attention to this.



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