

MEMORANDUM JAN 23 1985

TO: William Miller (PM Team 16)
Registration Division (TS-767C)

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SUBJECT: Registration Standard - Sulfuryl Fluoride

Attached is a copy of EEB's Topical Summary, Disciplinary Review,
and a Data Evaluation Record.

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Ecological Effect
Topical Discussion

No studies were received, however, EEB does not require studies for a gaseous product with a strictly indoor use.

Precautionary Labeling

Because of the toxic nature of this product, shown in the mammalian studies from toxicology, EEB requires the: precautionary labeling statement stated in the Disciplinary Chapter under the Ecological Effects Labeling Requirements.

Sulfuryl Fluoride
Disciplinary Chapter
Ecological Effects Profile
Toxicity Data

No data on the toxicity of Sulfuryl Fluoride on terrestrial and aquatic organisms was submitted.

Ecological Effects - Hazard Assessment

Because of the currently registered use as a fumigant for barns, stored gains and domestic dwellings, no hazard assessment will be conducted on either the manufacturing use or the end use products.

Endangered Species Consideration

Because of the currently registred use patterns no exposure is expected.

Ecological Effects Labeling Requirements

EEB proposes the following labeling for the environmental hazards section of the indicated lablels.

Manufacturing Use Products

"This product is toxic to fish and wildlife. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or public waters unless this product is specifically identified and addressed in a NPDES permit. Do not discharge effluent containing this product to sewer systems without previously notifying in writing the sewage treatment plant authoriitiy. For guidance contact your State Water Board or Regional Office of the EPA".

End Use Products

No labeling is prescribed.

Generic Data Requirements for Sulfuryl Fluoride

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Data Requirement	Composition 1/ Use 2/ Pattern	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)
\$158.145 Wildlife and Aquatic Organisms				
<u>Avian and Mammalian Testing</u>				
71-1 - Avian Oral LD ₅₀	TGAI	I		NO 3/ NO 3/
71-2 - Avian Dietary LC ₅₀	TGAI	I		
71-3 - Wild Mammal Toxicity	N/A			
71-4 - Avian Reproduction	N/A			
71-5 - Simulated and Actual Field testing - Mammals & Birds	N/A			
<u>Aquatic Organisms Testing</u>				
72-1 - Freshwater Fish LC ₅₀	TGAI	I		NO 3/ NO 3/
72-2 - Acute LC ₅₀ Freshwater Invertebrates	TGAI	I		
72-3 - Acute LC ₅₀ Estuarine and Marine Organisms	N/A			
72-4 - Fish Early life stage and Aquatic Invertebrate Life Cycle	N/A			
72-5 - Fish Life Cycle	N/A			
72-6 - Aquatic Organisms Accumulation	N/A			
72-7 - Simulated or Actual Field testing - Aquatic organisms	N/A			

1/ Composition TGAI = Technical grade of the active ingredient

2/ Use Pattern: I = Indoor

3/ EPA does not attempt a hazard assessment on a highly volatile gas with a strictly indoor use.