

098301  
SHAUGHNESSEY NO.

REVIEW NO

EEB BRANCH REVIEW

DATE: IN 1/29/81 OUT 2/11/81

FILE OR REG. NO. 81-TX-08  
PETITION OR EXP. PERMIT NO.  
DATE OF SUBMISSION 12/30/80  
DATE RECEIVED BY HED 1/28/81  
RD REQUESTED COMPLETION DATE 2/14/81  
EEB ESTIMATED COMPLETION DATE 2/13/81  
RD ACTION CODE/TYPE OF REVIEW 510/Section 18

TYPE PRODUCT(S): I, D, H, F, (N), R, S Nematicide  
DATA ACCESSION NO(S).  
PRODUCT MANAGER NO. Don Stubbs (41)  
PRODUCT NAME(S) TEMIK 15G

COMPANY NAME Union Carbide  
SUBMISSION PURPOSE Submission of residue analysis in citrus groves  
(coordinate with EFB)

SHAUGHNESSEY NO.	CHEMICAL, & FORMULATION	% A.I.
098301	Aldicarb (2-methyl-2-(methylthio)propionaldehyde O-(methylcabamoyl) oxime)	15

## Section 18/Texas/Grapefruit/Aldicarb.

### I. Introduction

This section 18 is reproposed from the original request of March 4, 1980 and includes actual monitoring data, water quality and soils data, which were previously unavailable.

### II. Data Adequacy

Although no data was submitted to EEB, we note that the data referred to above was reviewed by the Environmental Fate Branch (EFB, Carsel, 2/3/81). This data addressed aquatic concentrations of Aldicarb in the appropriate areas, as of September, 1980.

The aquatic hazards relevant to this Section 18 are indicated in previous EEB reviews and memos on this particular case (see review of Bascietto 2/12/80; memo of 2/29/80, Bascietto to Critchlow; memo of 4/ /80, Bascietto to Critchlow). In particular, the hazards are a result of possible aquatic contamination of the Laguna Madre shrimp fishery, an economically important entity of the Gulf Coastal region.

The water quality and monitoring data which was supposed to address the above concerns (as well as those for ground water contamination) was reviewed by EFB. That branch's review clearly indicates that the monitoring and water quality reports commence in September, 1980 (several months after application of aldicarb to the orange groves). Unfortunately, the most critical period for evaluating the estimated environmental concentrations is the period immediately following application (i.e., Spring, 1980). Elgindi, et al., 1978 (as referenced by Carsel's 2/3/81 review) shows that most aldicarb is dispersed in the immediate post-application period. This period would also coincide with critical reproductive considerations in the fishery of concern. The implication we draw from all of this is that the data reports commencing as of September, 1980 are inadequate to address concerns over citrus tile-drainage effluents and surface runoff routes to the Laguna Madre Bay.

### III. Recommendations

EEB has no adequate runoff monitoring data upon which to base a reversal of our previous position on this issue, and cannot make a favorable recommendation for this Section 18. We would, however, be most anxious to review monitoring data taken at the more appropriate time.

EEB does not concur with this Section 18.

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