

APR 27 1982

Memorandum

TO: Jay Ellenberger, Product Manager No. 12
Registration Division (TS-767)

THRU: Clayton Bushong, Chief /S/
Ecological Effects Branch
Hazard Evaluation Division (TS-769)

SUBJECT: April 9, 1982 meeting on the conditional registration
of Temik 10G/15G

In the subject meeting, EEB personnel (Charles Bowen, Richard Balcomb and Norman Cook) met with P.M., Ellenberger and representatives from Union Carbide (J.S. Lovel and R.L. Bertwell) to discuss data required for the conditional registration of Temik 10G/15G on sorghum, tomatoes, and citrus (grapefruit, lemons, and limes). Studies requested were identified in two previous EEB reviews (Bowen 10-07-81 and Bowen 02-20-82). Results of this meeting have been grouped into terrestrial and aquatic components so as to help reduce confusion.

Terrestrial Testing Requirements

The registrant objected to EEB's requirements that the Union Carbide conduct field searches designed to quantify Temik's impact on birds and mammals. Both representatives argued that because Temik was an incorporated granular, there could be no exposure and hence no possible hazards to non-targets.

EEB stated that contrary to the registrant's belief, recent research had shown that:

1. Granular pesticides cannot be totally incorporated. (Bunyan, et al. 1981).
2. Incorporated granules can still pose a hazard to non-target birds (Balcomb and Bowen 1982).
3. Field studies conducted with Aldicarb and other granular pesticides have documented both avian and mammalian mortalities occurring at labeled rates of application (Balcomb and Bowen 1982; Bunyan, et al. 1981).

CONCURRENCES

SYMBOL	TS769	TS769	TS-769					
BJRNAME	Bowen	Matheny	Bushong					
LATE	4/26/82	4/26/82	4/27/82					

The registrant also stated that Union Carbide had already submitted studies (i.e., small pen, etc.) that addressed Aldicarb's hazard to wildlife.

EEB indicated that the design of studies previously submitted could not reflect the hazards associated with proposed use patterns and as such did not provide information useful to completion of an incremental risk assessment.

In conclusion, the registrant agreed to conduct the required field monitoring studies on sorghum as presented in the Branch review, but refused to even discuss citrus studies (Footnote #1). EEB assured the registrant that information obtained from a valid field study would be extrapolated to other crops where labeled rates and methods of application were similar. Aquatic

Testing Requirements

The registrant also objected to conducting chronic fish and invertebrate testing with Aldicarb because:

1. Temik was an incorporated granular and, as such, could not contaminate runoff waters.
2. Data submitted to the Agency could substantiate this belief.
3. There are no records of Aldicarb contamination of surface waters.

EEB agreed that if such information existed, it should be referenced and/or submitted (via PM) to the Environmental Fate Branch. If EFB concludes that Aldicarb will never contaminate surface runoff waters, EEB will waive chronic fish and invertebrate testing.

Footnote # 1

Temik 10G/15G was conditionally registered on lemons, limes, and grapefruit approximately 2 months prior to this meeting. The registrant evidently feels that since they already have the registration there is no need to conduct citrus field studies. EEB is of the opinion, however, that since this product was conditionally registered the field monitoring studies required in earlier Branch reviews (Bowen 10-07-81; Bowen 02-20-82) are still a condition for registration.

In conclusion, EEB will await EFB's written opinion as to whether or not Aldicarb residues will or will not contaminate rainwater runoff and/or irrigation return flow waters. The registrant was notified, however, should such testing be required that EEB had modified its original data requests for chronic fish testing. The rationale for changes in fish testing and endangered species labeling are outlined in Attachment I (Copy of this document which was hand delivered to PM on April 16, 1982).

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TS-769:EEB:CBowen:gs:X75610:CS#4:RM200:4/21/82
cc: RF, CBowen

Attachment

References Cited

Balcomb R. and C. Bowen, D. Wright and M. Law. 1982. Granular Carboforan: Corn Application Affect Wildlife. Unpublished Manuscript.

P.J.Bunyan, M.J. Van Den Heuvel, P.I. Stanley and E.N. Wright. 1981. An intensive field trial and a multi-site surveillance exercise on the use of Aldicarb to investigate methods for the assessment of possible environmental hazards presented by new pesticides Agriculture Ecosystems, 7(1981) 239-262.

Erbuck, D.C. and J.J. Tollefson. 1982. Granular Insecticide Applications for Corn Rootworm Control. Unpublished manuscript.