DATA EVALUATION RECORD

PAGE 1 OF

| CASE: GS0333 | FENAMIPHOS | | | | | |
|-----------------|--|--|--|--|--|--|
| CONT-CAT: 01 | GUIDELINES: 72-1 | | | | | |
| MRID: 11 | 4012 | | | | | |
| Nemacu study | Lamb, D.; Roney, D. (1972) Acute Toxicity of Nemacur Technical and Nemacur 15% Granular to Fish: Report No. 34014. (Unpublished study received May 1, 1973 under unknown admin. no.; submitted by Mobay Chemical Corp., Kansas City, MO; CDL:120301-W). | | | | | |
| REVIEW RESULT | S: VALID INCOMPLETE | | | | | |
| GUIDELINE: | SATISFIED X PARTIALLY SATISFIED NOT SATISFIED | | | | | |
| DIRECT RVW TI | ME = START DATE: END DATE: | | | | | |
| REVIEWED 8Y: | Richard W. Felthousen | | | | | |
| TITLE: | Wildlife Biologist | | | | | |
| ORG: | EEB/HED | | | | | |
| LOC/TEL: | 557-1392 | | | | | |
| signature: | R. W. Sarlan DATE: 12/04/86 | | | | | |
| APPROVED BY: | O. Gutenson | | | | | |

ORG: EEB/HED

TITLE:

LOC/TEL:

SIGNATURE:

DATE:

The deficiencies noted with the studies are not considered significant enough to drastically have altered the toxicity of fenamiphos to fish. As such the four tests reported are considered scientifically sound and acceptable for use in a hazard assessment. The Guideline requirement for the technical material and 15% formulated product has been satisfied.

Acting Registration Standard Coordinator

DATA EVALUATION RECORD

1. Chemical: Nemacur

2. <u>Test Material</u>: Technical (81% ai)

15% Granular

3. Study Type: 96-hour Acute Study on a Warmwater and

Coldwater Fish Species.

Species Tested: Bluegill Sunfish

Rainbow Trout

4. Study ID: Lamb, D.W. and D.J. Roney. June 1, 1972. Acute Toxicity of Nemacur Technical and Nemacur 15% Granular to Fish. Prepared by Chemagro Division of Baychem Corp. Submitted to Mobay Chemical Corp.

Stilwell, Kansas. EPA Accession No. 256004.

5. Reviewed By: Elizabeth E. Zucker Signature:

Wildlife Biologist

Ecological Effects Branch/ Date:

HED

Signature:

Date:

6. Approved By: David Coppage

Supervisory Biologist

Ecological Effects Branch/

HED

7. Conclusions:

These studies relating the acute toxicity of technical and 15G Nemacur to freshwater fish are scientifically sound and acceptable for use in a hazard assessment.

8. Recommendations:

Reviewers should consider further freshwater fish acute testing for registration actions where a significant aquatic exposure is anticipated. The chemical/physical characteristics of the diluent were not described during the study period. D.O., pH, and hardness can significantly alter the toxicological properties of a compound. Nemacur is very highly toxic to fish and acute information must be reliable.

9. Background

These studies were reviewed in EEB, Review Out: November 25, 1977, by T. O'Brian. The 1977 DER's are brief, therefore studies were reevaluated under current standards.

10. Discussion of Individual Test - N/A

11. Materials and Methods

A. Test Procedures (from Test Report)

Preliminary range findings tests were conducted. For the definitive test a minimum of five concentrations of each formulation were prepared. To reach the desired concentration, aliquots of a stock solution were added to bioassay water. Water was used as a solvent for the formulation while acetone was used as a solvent for the technical material. A reference chemical, p, p'DDT, was tested concurrently.

Fish were obtained from commerical hatcheries. Fish were 35 to 75 mm in length and weighed 0.5 to 2.0 gm upon arrival. The fish were acclimated to reconstituted deionized water used for the bioassay. Each liter of deionized water was reconstituted with 30 mg of calcium sulfate, 30 mg of magnesium sulfate, 48 mg of sodium biocarbonate and 2 mg of potassium chloride to yield a pH of 7.0 to 7.4. Vessels consisted of 5 gallon wide-mouth glass jars which contained 15 liters of water. Ten fish were placed in each vessel and each vessel represented one concentration. The loading factor was approximately 1 gm of fish per liter of water. By means of a water bath, temperatures were maintained at 13°C for the rainbow trout and 22°C for the bluegill. During the 96-hour experiment, the fish were not fed, the water was not aerated, and mortality data was recorded at 24-hour intervals.

B. <u>Statistical Analysis</u>

Approximate LC50 values and 95% confidence limits were calculated according to the method of Weil [Carrol S. Weil: Biometrics, 8, 249-263, 1952].

12. Reported Results

Technical

| | | | Cumulative Mortality | | |
|----------|------------|------|----------------------|------|------|
| | Dose Level | 24 | 48 | 72 | 96 |
| Species | (dqq) | Hour | Hour | Hour | Hour |
| Bluegill | Control | 0 | 0 | 0 | 0 |
| D-1-9 | 6.1 | ŏ | ő | 0 | 1 |
| | 10.4 | Ō | Ö | ŏ | õ |
| | 17.5 | 1 | 3 | 5 | 6 |
| | 29.8 | 6 | 9 | 9 | 9 |
| | 50.6 | 10 | 10 | 10 | 10 |
| Rainbow | Control | O | n | . 0 | n |
| Trout | 17.5 | Ö | ŏ | Ò | ŏ |
| | 29.8 | 0 | . 0 | Ō | ì |
| | 50.6 | 0 | 0 | 0 | Ō |
| | 86.2 | 6 | 7 | 8 | 8 |
| | 146.4 | 10 | 10 | 10 | 10 |

15% Granular Formulation

| | | | Cumulat | ive Mor | tality |
|----------|------------|------|---------|---------|--------|
| • | Dose Level | 24 | 48 | 72 | 96 |
| Species | (ppb) | Hour | Hour | Hour | Hour |
| Bluegill | Control | n | n | 0 | 0 |
| Bidogiii | 49 | ő | ő | 0 | Ô |
| | 84 | Ō | ŏ | ĭ | ì |
| | 142 | 1 | 4 | 5 | 6 |
| | 241 | 7 | 7 | 7 | 7 |
| • | 410 | 10 | 10 | 10 | 10 |
| Rainbow | Control | 0 | 0 | 0 | 0 |
| Trout | 142 | Ö | Ö | Ō | Ō |
| | 241 | 0 | 0 | 0 | 0 |
| | 410 | 1 | 2 | 2 | 2 |
| | 698 | 4 | 7 | 7 | 7 |
| | 1186 | 10 | 10 | 10 | 10 |

13. Study Author's Conclusions

The 96-hour LC50 values and 95% confidence limits with Nemacur Technical are 17.7 (14.4 to 21.6) ppb for bluegill and 72.1 (61.2 to 84.7) ppb for rainbow trout. Nemacur 15% Granular formulation had 96-hour LC50 values and 95% confidence limits of 151 (114 to 201) ppb for bluegill and 563 (454 to 698) ppb for rainbow trout. Based on active ingredients, the formulation was less toxic than the technical material to both species.

14. Reviewer''s Discussion and Interpretation of the Study

A. Test Procedures

These studies were performed under conditions that generally comply with current testing standards with the following notable exceptions:

- 1. D.O., pH, and continuous temperature measurements were not reported for the testing period.
- 2. Hardness, alkalinity, conductivity of diluent were not recorded.
- Trout were tested in water 1°C higher than recommended.
- 4. It is not specifically stated in the report whether concentrations of the 15 G material are based on active ingredient or total formulation.
- 5. The scientific names of test organisms were not reported.
- Acclimation procedures were not described.

B. Statistical Analysis

The author's 96-hour calculations were through the use of the computer program developed by Stephans. Results are appended. The 96-hour LC_{50} 's determined by the author varied only slightly from the LC_{50} 's calculated by Stephans program.

C. Discussion/Results

Nemacur is very highly toxic to fish, therefore it is important to have complete information from acute testing. The chemical/physical characteristics of the diluent used in these studies were not described. D.O., pH, and hardness can significantly alter the toxicological properties of a chemical. Reviewers should consider requiring additional acute testing to support future registrations where a significant aquatic exposure is anticipated.

The bird studies were performed with a 90% technical, thus the technical product can have a purity higher than 81%. Extrapolation of the LC_{50} from the 81% active technical product to an LC_{50} expected with 100% active would provide the following values:

Rainbow Trout - 59.04 ppb (based on 100% ai)
Bluegill - 13.27 ppb (based on 100% ai)

The author does not specifically state that nominally designated concentrations for the 15 G test material were based on total formulation. However, it is implied by the concluding test report statement that concentrations are total formulation. Based on the above extrapolations for 100%, the following values would be expected for 15% active.

Rainbow Trout = 393.6 ppb Bluegill = 88.5 ppb

The granular material is less toxic than would be expected based on direct active ingredient extrapolation.

The LC₅₀ values determined for bluegills exposed to the DDT control were slightly lower than the LC₅₀ of 8.6 (6.2 - 12.0) ppb found by Johnson and Findley (1980). The LC₅₀ determined for trout exposed to DDT were similar to values determined by Johnson and Finley 8.7 (6.8 - 11.4) ppb.

C. Adequacy of Study

- 1. Classification: Supplemental for all four studies
- 2. Rationale: The physical/chemical characteristics of diluent were not described. D.O., pH, and hardness can significantly alter the toxicological properties of a compound. Because of Nemacur's very highly toxic effects, it is imperative that acute testing be thoroughly evaluated. The granular testing cannot be used to support registration of the technical product.
- 3. Repairability: None

| ZUCKER | NEEMACUR | RAINBOW TROUT | 96 HR 1 | LC50 15% GRANULAR (PPb) |
|--------|----------|---------------|----------|-------------------------|
| CONC. | NUMBER | NUMBER | PERCENT' | BINOMIAL |
| | EXPOSED | DEAD | DEAD | PROB. (PERCENT) |
| 1186 | 10 | 10 | 100 | .0976563 |
| 698 | 10 | 7 | 70 | 17.1875 |
| 410 | 10 | 2 | 20 | 5.46875 |
| 241 | 10 | 0 | 0 | .0976563 |
| 142 | 10 | 0 | 0 | .0976563 |

THE BINOMIAL TEST SHOWS THAT 241 AND 1186 CAN BE USED AS STATISTICALLY SOUND CONSERVATIVE 95 PERCENT CONFIDENCE LIMITS, BECAUSE THE ACTUAL CONFIDENCE LEVEL ASSOCIATED WITH THESE LIMITS IS GREATER THAN 95 PERCENT.

AN APPROXIMATE LC50 FOR THIS SET OF DATA IS 566.681

| RESULTS | CALCULATED | USING THE MOVING | AVERAGE MET | HOD |
|---------|------------|------------------|-------------|-------------------|
| .SPAN | G | LC50 | 95 PERCENT | CONFIDENCE LIMITS |
| 3 | .114286 | 558.566 | 453.478 | 695.718 |

NO CONVERGENCE IN 25 ITERATIONS. THE PROBIT METHOD PROBABLY CANNOT BE USED WITH THIS SET OF DATA.

| ZUCKER | NEEMACUR | BLUEGILL 96 HF | R LC50 15 | GRANULAR (PPb) |
|--------|-------------------|----------------|-----------------|----------------------------|
| CONC. | NUMBER EXPOSED | NUMBER DEAD | PERCENT DEAD | BINOMIAL PROB.(PERCENT) |
| 410 | 10 | 10 | 100 | .0976563 |

| CONC. | MONDER | NOVIDER | PERCENT | PINOMIAL |
|-------|---------|---------|---------|-----------------|
| | EXPOSED | DEAD | DEAD | PROB. (PERCENT) |
| 410 | 10 | 10 | 100 | .0976563 |
| 241 | 10 | 7 | 70 | 17.1875 |
| 142 | 10 | 6 | 60 | 37.6953 |
| 84 . | 10 | 1 | 10 | 1.07422 |
| 49 | 10 | 0 | 0 | .0976563 |
| | | | | |

THE BINOMIAL TEST SHOWS THAT 84 AND 410 CAN BE USED AS STATISTICALLY SOUND CONSERVATIVE 95 PERCENT CONFIDENCE LIMITS, BECAUSE THE ACTUAL CONFIDENCE LEVEL ASSOCIATED WITH THESE LIMITS IS GREATER THAN 95 PERCENT.

AN APPROXIMATE LC50 FOR THIS SET OF DATA IS 129.044

RESULTS CALCULATED USING THE MOVING AVERAGE METHOD

SPAN G LC50 95 PERCENT CONFIDENCE LIMITS
4 .114994 150.256 117.456 195.091

RESULTS CALCULATED USING THE PROBIT METHOD

ITERATIONS G H GOODNESS OF FIT PROBABILITY
5 .203835 1 .501188

SLOPE = 4.58022

95 PERCENT CONFIDENCE LIMITS = 2.51234 AND 6.64809

LC50 = 151.016

95 PERCENT CONFIDENCE LIMITS = 115.653 AND 197.732

LC10 = 79.7521

95 PERCENT CONFIDENCE LIMITS = 43.3254 AND 106.158

| ZUCKER | NEEMACUR | BLUEGILL ***** | 96 HOUR LC50 | SI% TECHNICAL (PPb) |
|--------|-------------------|-------------------|-----------------|----------------------------|
| CONC. | NUMBER EXPOSED | NUMBER DEAD | PERCENT DEAD | BINOMIAL PROB.(PERCENT) |
| 50.6 | 10 | 10 | 100 | .0976563 |
| 29.8 | 10 | 9 | 90 | 1.07422 |
| 17.5 | 10 | 6 | 60 | 37.6953 |
| 10.4 | 10 | 0 | 0 | .0976563 |
| 6.1 | 10 | 1 | 10 | 1.07422 |

THE BINOMIAL TEST SHOWS THAT 10.4 AND 29.8 CAN BE USED AS STATISTICALLY SOUND CONSERVATIVE 95 PERCENT CONFIDENCE LIMITS, BECAUSE THE ACTUAL CONFIDENCE LEVEL ASSOCIATED WITH THESE LIMITS IS GREATER THAN 95 PERCENT.

AN APPROXIMATE LC50 FOR THIS SET OF DATA IS 16.3825

RESULTS CALCULATED USING THE MOVING AVERAGE METHOD

SPAN G LC50 95 PERCENT CONFIDENCE LIMITS 4 .166084 17.7482 13.0105 24.3401

RESULTS CALCULATED USING THE PROBIT METHOD

ITERATIONS GOODNESS OF FIT PROBABILITY .205999 4 1 .152003

4.72155 95 PERCENT CONFIDENCE LIMITS = 2.57858 AND 6.86453

LC50 = (16.3839)

SLOPE =

95 PERCENT CONFIDENCE LIMITS = 12.5706 AND 21.3046

LC10 = 8.81939

95 PERCENT CONFIDENCE LIMITS = 4.81418 AND 11.689 *************** ZUCKER NEEMACUR RAINBOW TROUT TECHNICAL 96 HR LC50 ************** NUMBER PERCENT BINOMIAL CONC. NUMBER DEAD. PROB. (PERCENT) **EXPOSED** DEAD 100 10 10 .0976563 146.4 5.46875 80 10 8 86.2 50.6 0 0 .0976563 10 1.07422 10 29.8 10 .0976563 17.5 10

THE BINOMIAL TEST SHOWS THAT 50.6 AND 146.4 CAN BE USED AS STATISTICALLY SOUND CONSERVATIVE 95 PERCENT CONFIDENCE LIMITS, BECAUSE THE ACTUAL CONFIDENCE LEVEL ASSOCIATED WITH THESE LIMITS IS GREATER THAN 95 PERCENT.

AN APPROXIMATE LC50 FOR THIS SET OF DATA IS 72.8934

RESULTS CALCULATED USING THE MOVING AVERAGE METHOD

SPAN G LC50 95 PERCENT CONFIDENCE LIMITS 3 .166896 74.2546 57.928 99.7584

RESULTS CALCULATED USING THE PROBIT METHOD

ITERATIONS G H GOODNESS OF FIT PROBABILITY 6 1.78817 2.69792 .0441133

SINCE THE PROBABILITY IS LESS THAN 0.05, RESULTS CALCULATED USING THE PROBIT METHOD PROBABLY SHOULD NOT BE USED.

SLOPE = 6.0592 95 PERCENT CONFIDENCE LIMITS =-2.04332 AND 14.1617

LC50 = 67.9008 95 PERCENT CONFIDENCE LIMITS = 0 AND +INFINITY

LC10 = 41.906
95 PERCENT CONFIDENCE LIMITS = 0 AND 73.8386