

105001
SHAUGHNESSEY NO.

15
REVIEW NO.

EEB BRANCH REVIEW

DATE: IN 3/18/83 OUT 5/10/83

FILE OR REG. NO. 241-238

PETITION OR EXP. PERMIT NO. _____

DATE OF SUBMISSION 3/11/83

DATE RECEIVED BY HED 3/17/83

RD REQUESTED COMPLETION DATE 5/27/83

EEB ESTIMATED COMPLETION DATE 5/20/83

RD ACTION CODE/TYPE OF REVIEW 336/amendment

TYPE PRODUCT(S): I, D, H, F, N, R, S insecticide/nematicide

DATA ACCESSION NO(S). N/A

PRODUCT MANAGER NO. W. Miller (16)

PRODUCT NAME(S) Counter 15G

COMPANY NAME American Cyanamid Company

SUBMISSION PURPOSE Registrant response to endangered species

restrictions

SHAUGHNESSEY NO. CHEMICAL, & FORMULATION % A.I.

105001 Terbufos 15



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

MAY 12 1983

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

Memorandum

To: W. Miller, Product Manager
Team #16, RD

Thru: Raymond W. Matheny, Head *RWM*
Section #1
EEB/HED

Thru: Clayton Bushong, Chief *CB*
EEB/HED

Subject: Proposed terbufos use on soybeans (Reg. No. 241-238);
endangered species labeling; data gaps

The 3/17/83 RD Data Review Record asks whether the endangered species geographical restrictions cited in a 7/7/82 memorandum from W. Rabert are still applicable to the proposed use of terbufos on soybeans. The 7/7/82 memo appears to be a personal cover note of W. Rabert's submitted to RD along with his 6/15/82 review. In this latter review, based on an examination of three existing Office of Endangered Species (OES) opinions, W. Rabert cited labeling to protect four species: Attwater's Greater Prairie Chicken, Aleutian Canada Goose, Alabama cavefish, and Delmarva Peninsula fox squirrel. "Jeopardy" was said to be identified by OES only for the first two species. There apparently was considerable confusion as to the number of counties to cite for the Attwater's Greater Prairie Chicken. The 6/15/82 review cites 13 counties, a 6/14/82 letter to OES (C. Bushong) suggests 9 counties for consistency with an earlier OES opinion, and the 7/7/82 cover memo cites 10 counties based on a phone conversation with OES. A 7/9/82 letter from OES (with 7/16/82 EEB memorandum of transmittal to RD) documents the 10 counties in which this species is presently found, based on recent (1980-1982) survey data. It indicated that terbufos use on soybeans and sorghum will not affect listed species if the use restrictions in the 6/14/82 letter are imposed and the updated, 10-county list for the Attwater's Greater Prairie Chicken is incorporated into the restrictions. An 11/3/82 memo from EEB (W. Rabert) to RD again cites the Delmarva Peninsula fox squirrel and also cites the Morro Bay Kangaroo Rat, although no additional label restrictions were cited. On 11/4/82 W. Rabert amended his 6/15/82 review to delete the proposed labeling for Alabama cavefish and Delmarva Peninsula fox squirrel, "in accordance with EEB policy to regulate only those species which OES identifies as in jeopardy".

A request from EEB (C. Bushong) for a formal Section 7 consultation with OES for all "may impact" pesticides currently used on soybeans was submitted to OES 2/28/83 as part of EEB's "cluster" program for endangered species. This request cites two avian, one or two amphibian, six fish, and 21 mollusc species as likely to be exposed to soybean pesticides (i.e., considerably more than cited above). Results of this consultation will be applicable to the proposed terbufos use on soybeans.

EEB considers the proposed use of terbufos on soybeans to be a major new use and thus to pose a substantial increase in exposure and potential risk to nontarget organisms. Data needed by EEB to complete a hazard assessment for this use pattern include the same requirements already cited in EEB's Registration Standard Phase II Disciplinary Review data requirements table, which covered corn, sorghum, and sugar beet use patterns (12/16/82): raw data to complete review of the already-submitted avian reproduction studies, terrestrial field study, estuarine/marine organism acute toxicity studies, embryo-larvae study with the bluegill sunfish, and aquatic invertebrate life-cycle study. The table indicates those studies that are reserved pending completion of existing requirements. The 2/11/82 EEB review (T. Johnston) requests "data on runoff rates of Counter 15G when it is applied at the approximate depths used for soybean applications (0.5-1.0 inch)". Thus, to compare results of aquatic testing with potential aquatic residues under the soybean use pattern will require specific EECs from EAB for this use (unless EAB is able to otherwise relate expected residues under this use to EECs produced or pending for corn).


James D. Felkel