

☒ ☒ ☒

EEE BRANCH REVIEW

DATE: IN _____ OUT _____ IN 11/10/75 OUT 11/12/75 IN _____ OUT _____
FISH & WILDLIFE ENVIRONMENTAL CHEMISTRY EFFICACY

FILE OR REG. NO. 241-238
PETITION OR EXP. PERMIT NO. PP5F1640
DATE DIV. RECEIVED 11-3-75 & 10-9-75
DATE OF SUBMISSION 11-3-75 & 10-9-75
DATE SUBMISSION ACCEPTED _____
TYPE PRODUCT(S): (I) D, H, F, N, R, S _____
PRODUCT MGR. NO. Gee (16)
PRODUCT NAME(S) Counter 15G
COMPANY NAME American Cyanamid
SUBMISSION PURPOSE _____
CHEMICAL & FORMULATION Terbufos granular

1.0 Introduction

Registrant submits rotational crop data in regard to registered use on corn EPA Reg. No. 241-238 with proposed label amendment deleting rotational crop restriction. Submission date is 10-9-75.

Applicant submits revised Section F of PP5F1640 regarding use of terbufos on sugar beets and refers to rotational crop residue data, as above, with the intent of deletion of label restriction on sugar beet label. Submission date is 10-9-75.

In our previous reviews of this chemical (F. J. Schenck, 9-22-75, PP5F1640 [sugar beets]) (R. W. Cook, 12-20-74, PP4F1496 [corn]), rotational crop residue data has been requested. In lieu of such data, a label restriction has been required. Applicant now has such data and is requesting deletion of rotational crop restriction from corn label (EPA Reg. No. 241-239) and proposed sugar beet label (PP5F1640). Current review is of the rotational crop data submitted 10-9-75 (EPA Reg. No. 241-239).

2.0 Directions for Use

EPA Reg. No. 241-238:

Delete the following

"All applications: Treated areas may be rotated to corn or soybeans without restriction. Do not rotate treated area for 365 days to any other crops. Cover crops may be planted in treated areas if not grazed and plowed under."

PP5F1640

Delete the above for sugarbeet use also.

3.0 Discussion of Data

Rotational crop residue uptake studies, including some soil analyses, were conducted in five locations. Rotational crops include sugarbeet, red beet, snap beans, oats, and spring wheat. Analysis by adequate previously reviewed analytical procedure based on oxidation of parent and several metabolites to the oxygen analog sulfone.

Results:

No significant residues were found in any rotational crop residue sample.

Residues in Rotational Crops

<u>cation</u>	<u>Treatment Rate</u> (lbs. A/A)	<u>Treatment to Sampling Interval</u> (days)	<u>Days PHI</u>	<u>Soil</u>	<u>Beans</u>	<u>Residues (ppm)</u>			<u>Wheat</u>
						<u>Oats</u>	<u>Beets</u> <u>Roots</u> <u>Tops</u>		
ookings, S.D.	1.25	335 401	19	< 0.05	< 0.05	< 0.05			
ment, Ill.	2.0	389 410	53	0.057	< 0.05 < 0.05	< 0.05	< 0.05 < 0.05	< 0.05	
neva, N.Y.	2.0	348 391	47	0.053	< 0.05	< 0.05		< 0.05	
fayette, Ind.	1.0	335 371 380	38 47	< 0.05	< 0.05	< 0.05		< 0.05	
eeley, Colo.	2.0 2.0	437 437	56 56		< 0.05 < 0.05	< 0.05	< 0.05 < 0.05	< 0.05 < 0.05	< 0.05

4.0 Recommendation

Petitioner has submitted data from 5 locations on the following rotational crops; sugarbeets, red beets, snap beans, oats and spring wheat. These data are to be used to support deletion of the crop rotation restriction. Based on the following we can go along with the deletion; crops contained less than 0.05 ppm when planted and harvested 17 to 56 days about 335 to 437 days after treatment.

R. E. Ney 11/13/75

Ronald E. Ney, Jr.

11/12/75

R. W. Cook 11-13-75

R. W. Cook

11/12/75

Environmental Chemistry Section

Efficacy and Ecological Effects Branch

EEB
Ney

SUBJECT:

DATE: 7/2/75

FROM:

PM 16

TO: ~~Coordination Branch~~ and Environmental Chemistry Review
Section, Ecological Effects Branch

PP# 5F1640 has been filed proposing the use of Counter on sugar beets
A 70-15 review (as relates to soil persistence) is needed.

To meet petition deadlines, please complete and submit your review to
the Chemistry Branch Office by 8/16/75 (45 DDL)

R. S. Quick
Chemistry Branch
Registration Division

→ Revised 11/11/75
Petitioner has submitted data
to show that residues are
less than 0.05 ppm in rotated
crops sugarbeets, red beets, oats,
spring wheat. 11/11/75 R. S. Quick
Planting to harvest 17 to 56 days

Data on rotational crops (sugarbeets data) will
support an interval of 1 year from application
to planting. Data There are no data to support
an interval earlier than one year. Data is
being requested.

The following type restriction is suggested
"Do not rotate treated area for one year
following application except with crops
listed on the label" and "Cover crops may be
planted in treated area in plowed under and
not grazed". These are similar to those proposed
for corn use in corn fields.

Ronald E. Ney 7/24/75

See Attachment

Ronald Ney
Environmental Chemistry Section
EEEB

5

Revised opinion to Chemistry Branch
First opinion given 7/24/75
Revised 11/12/75

Counter

5F1640

Petitioner has submitted data
from 5 locations on the
following rotational crops;
sugarbeets, red beets, rapeseed,
oats and spring wheat.

Residues to sampling
(treatment to sampling 335 to 432
days) are less than 0.05 ppm.
Crops were planted 17 to 56 days
and then harvested.

The data indicates that crops
can be rotated without hazards
of residues to rotational crops.

R. Ney 11/12/75

Ronald Ney
Environmental Chemistry Section
E E E S