(5)

DATE: IN _____ OUT _____ IN 9/2/75 OUT 9/18/75 IN _____ OUT _____

FISH & WILDLIFE ENVIRONMENTAL CHEMISTRY DEFICIENCY

FILE OR REG. NO. _____

PETITION OR EXP. PERMIT NO. 6F1657

DATE DIV. RECEIVED _____

DATE OF SUBMISSION _____

DATE SUBMISSION ACCEPTED _____

TYPE PRODUCT(S): (I), D, H, F, H, R, S _____

PRODUCT MGR. NO. 16

PRODUCT NAME(S) Counter 15 G

COMPANY NAME American Cyanimid

SUBMISSION PURPOSE Label change, petition for tolerance

CHEMICAL & FORMULATION Terbufos

4 pages

1.0 Recommendations

To completely evaluate the hazard to rotational crops, a rotational crop study carried out according to the following protocol is needed, but it may be obtained after registration. This was also requested with 5F1640.

ROTATIONAL AND/OR SUBSEQUENT CROP RESIDUE STUDIES

(Radiolabeled study)

1. For crops rotated immediately after harvest of a crop in the treated area, the pesticide is to be aged in a Sandy loam soil under aerobic conditions for about 120 days, then the soil planted to a root crop, small grain, and a vegetable. The root crop is required; however, crops in two other crop groupings may be substituted for the samll grain and vegetable.

2. For crops rotated the following year after treatment, the pesticide is to be aged in the soil for one year prior to planting Crops should be as above.

3. If significant residues are found, then actual field studies using non-labeled pesticide will be required. Such data must be obtained under actual agricultural practice.

4. If residues are found in rotational and/or subsequent crops in the field, then a labeling restriction will be needed. This restriction will take the form of a time interval from application to planting of rotational crops such that illegal residues will not occur in the rotational crop. A restriction longer than 18 months is not acceptable.

5. Cover crops can be rotated if label restrictions are such that the cover crop is plowed under and not grazed.

6. If the agricultrual practice is such that a treated crop area is rotated with another crop that will result in another treatment of the pesticide to the same area, residue data will be required on the second crop. The rotational crop is to be grown under actual use conditions.

NOTE: All radiolabeled studies should be supported with the following information:

a. Sample calculations;

b. Counting efficiency;

c. Counting time;

d. Background levels;

e. Probable error with scintillation techniques.

2.0 Introduction

2.1 See environmental chemistry reviews dated 5/20/75 and 10/16/74.

2.2 Proposed amendment of tolerances for Terbufos and its cholinesterase inhibiting metabolites of 0.5 ppm on corn forage and fodder and 0.05 ppm in or on corn grain.

2.3 Label change to include a label restriction for rotational crops as requested in review dated 10/16/74, of 4F-1496 (Terbufos on corn)

3.0 Directions for Use

3.1 See review dated 5/20/75 of submission of 4/1/75.

3.2 Treated area 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 area if not grazed and plowed under.

4.0 Conclusions

4.1 No new environmental chemistry data submitted.

4.2 This was review under old procedures as there is no mention if new ones apply.

9/22/75

Ronald E. Ney, Jr. 9/18/75
Frank J. Schenck 9/16/75

Environmental Chemistry Section
E.E.E.B.

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EEB
Ney

SUBJECT:

DATE: 8/22/75

FROM:

PM 16

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

PP# 6F-1657 has been filed proposing the use of Counter on corn.

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 9/28/75 (45 DDL)

R. S. Quick
Chemistry Branch
Registration Division

1. The restriction on the label for rotational crops are acceptable and supported by Environmental chemistry data. See 5F1640.
2. Addition data on rotational crops has been requested & remove restriction and will be requested for this petition see 6F1640

Ronald E Stagg Jr 9/18/75
Environmental Chemistry Section
EEB

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EPA Form 1320-6 (Rev. 6-72)