



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

JUL 27 1983

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

Memorandum

To: William Miller, PM
Team #16, RD

Thru: Harry Craven *Harry Craven*
Registration Standards Coordinator
EEB/HED

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

Subject: Terbufos aquatic exposure assessment (Registration Standard)

EEB has received EAB's 6/20/83 corrections to its original pond EEC (12/10/82) for the maximum use rate of terbufos on corn, as well as a 6/23/83 addendum providing river system EECs. We understand that the corrected pond EEC has taken into account soil incorporation, based in part on label and other information provided by EEB in November and early December, 1982. We also understand that EAB has made corrections to other model parameters. No information was provided, however, in response to EEB's 11/10/82 and 12/16/82 requests for EECs over a range of application rates.

As per discussion in the 4/7/83 team meeting re terbufos (and subsequent conversations with C. Offutt of EAB), EEB understands that EAB is planning to produce aquatic EECs for terbufos use on sorghum and sugarbeets, in addition to providing the requested range for corn use (it was not until after the 4/7/83 meeting that EEB was informed, via SIS, that EAB needed to make corrections to the one EEC already provided). Since sugarbeets is the only use addressed by the Standard that is not presently completed or under review by the Office of Endangered Species (USFWS) under the ongoing "cluster" project, EECs for this use would be appreciated first.

James D. Felkel
James D. Felkel
Wildlife Biologist
Section #1, EEB/HED

cc: D. Severn (EAB)
L. Touart (EEB)

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U.S. Department of the Interior
Fish and Wildlife Service
Washington, DC 20240

Attention: Mr. John Spinks, Chief
Office of Endangered Species

RE: Section 7 Consultation Request: Terbufos use on sugarbeets

Dear Mr. Spinks:

The Ecological Effects Branch (EEB) hereby requests a formal Section 7 consultation for the use of terbufos (Counter™ 15G) on sugarbeets. As part of the Registration Standard process for this chemical, the Agency has recently issued (6/83) a Guidance Package for the reregistration of terbufos manufacturing use products labeled for formulation into end-use products for use on corn, grain sorghum, and sugarbeets, specifying outstanding data requirements. Jeopardy to listed species under the corn use has been addressed in a 5/19/83 Biological Opinion from OES, as part of the corn "cluster". Consultation was initiated by the Agency for the sorghum "cluster" 6/1/83 and the Agency will apply the OES Biological Opinion for this use to terbufos. A similar "cluster" is not expected in the near future for sugarbeets and thus the present request is made.

Based on a 1/22/82 OES Opinion on phorate, a closely related granular compound also registered on sugarbeets (among other crops), it appears that at least the Aleutian Canada Goose may be exposed by potential, if not present, terbufos use on sugarbeets under labeling that permits usage in California. The phorate Opinion did not cite any aquatic species. However, please note that modeling to date by the Exposure Assessment Branch has shown the potential for aquatic exposure exceeding endangered species screening levels of concern under a corn use of terbufos. This may also be the case with sugarbeet use; EECs are not yet available for this use pattern. Information regarding listed species jeopardized under the corn use, from the 5/19/83 OES Opinion, was submitted to the Registration Division for inclusion in the Guidance Package. Restrictions to protect these species are under development. Please indicate whether additional species may be exposed with sugarbeet use.

Enclosed is a copy of the current terbufos label, the 12/16/82 EEB Phase II Topical Discussions and Disciplinary Review, a more recent EEB review (3/23/83) on corn which provides some updated hazard assessment material, and very recent reports of EAB modeling. Please note that certain of these enclosures contain Confidential Business Information and must be treated as such. If you have any questions, please feel free to contact Harry Craven (557-7695), Richard Stevens (557-7695), or James Felkel (557-7667) of EEB.

Clayton Bushong, Chief
Ecological Effects Branch
Hazard Evaluation Division TS-769C

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