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OFFICE OF
PREVENTION, PESTICIDES, AND
TOXIC SUBSTANCES

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MEMORANDUM

November 6, 2006

SUBJECT: **Prothioconazole Section 3:** Revised Environmental Fate and Ecological Risk Assessment

TO: Tony Kish, Product Manager
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EBH for Chris Salice 11/8/06.

THROUGH: Elizabeth Behl, Branch Chief
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EBH 11/6/06
EBH for T. Steeger 11/8/06
R. David Jones 11/8/2006

Environmental Fate and Effects Division (EFED) has completed revisions of its ecological risk assessment for the new fungicide prothioconazole and its end-use product PROLINE® 480SC (41.0% a.i.). The fungicide is initially proposed for use on wheat, barley, oil seed (except sunflower and safflower), dried shell pea and bean (except soybean), peanut, and rice. A total toxic residues approach (including prothioconazole and two primary degradates: prothioconazole-desthio and prothioconazole-S-methyl) was used to estimate ecological exposure levels. Combined residues of concern are expected to be persistent and moderately mobile.

The results of this revised screening-level assessment indicate that there is a potential for direct adverse acute effects to non-target fresh- and saltwater non-vascular plants, freshwater vascular plants, and saltwater invertebrates other than mollusks at the proposed application rates for some uses. The results also indicate a potential for adverse effects associated with chronic exposures to mammals for all proposed uses of prothioconazole. For listed species, acute risk levels of

concern were exceeded for estuarine/marine invertebrates, semi-aquatic plants, aquatic plants, and freshwater fish. Listed species chronic risk levels of concern were exceeded for mammals.

Prothioconazole Recommended Label Language:

"Prothioconazole-desthio (a degradate of prothioconazole) is toxic to shrimp. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwater or rinsate."

"Prothioconazole-desthio (a degradate of prothioconazole) is known to leach through soil into ground water under certain conditions as a result of label use. Use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in ground-water contamination."

"This product may contaminate water through drift of spray in wind. This product has a high potential for runoff for several months or more after application. Poorly draining soils and soils with shallow watertables are more prone to produce runoff that contains this product. A level, well maintained vegetative buffer strip between areas to which this product is applied and surface water features such as ponds, streams, and springs will reduce the potential for contamination of water from rainfall-runoff. Runoff of this product will be reduced by avoiding applications when rainfall is forecasted to occur within 48 hours."

Status of Fate and Ecotoxicity Data for Prothioconazole:

Tables 1 and 2 list all of the available environmental fate and ecological effect studies, respectively, and the acceptability of each study. The major uncertainties in characterizing the environmental fate of prothioconazole involve non-rigorous soil extraction procedures, lack of complete information on the fate of the 1,2,4-triazole degradate, and inability to calculate parent adsorption coefficient and bioaccumulation factor. The major uncertainties in characterizing effects of prothioconazole and/or prothioconazole-desthio are associated with the toxicity of prothioconazole-desthio to estuarine/marine invertebrates, the lack of an acceptable sediment toxicity test, and the lack of data on the effects of the 1,2,4-triazole degradate. However, in general, all of the studies contained sufficient information on the fate and effects of prothioconazole for EFED to complete an ecological risk assessment of the chemical.

Table 1. Status of environmental fate data adequacy for prothioconazole.

| Guideline | | Description | MRID | Title | Substrate | Study Classification |
|-----------|---------|-------------|----------|---|-------------------------------|----------------------|
| 161-1 | 835.212 | Hydrolysis | 46246505 | Hydrolysis of [Phenyl-UL- ¹⁴ C] JAU6476 in Sterile Aqueous Buffer Solutions. | Prothioconazole; phenyl label | Acceptable |

| Guideline | | Description | MRID | Title | Substrate | Study Classification |
|-----------|----------------------|-------------------------------|----------------------------------|---|---|--|
| 161-1 | 835.212 | Hydrolysis | 46246506 | SXX0665: Hydrolysis in Buffers. | Prothioconazole-desthio; phenyl label | Supplemental |
| 161-2 | 835.224 | Photolysis in Water | 46246507 | Photolysis of JAU6476 in Sterile Aqueous Buffer. | Prothioconazole; phenyl and triazole labels | Supplemental |
| 161-3 | 835.241 | Photolysis on Soil | 46246510 | Photolysis of JAU6476 on Soil Surface. | Prothioconazole; phenyl label | Acceptable |
| 161-4 | 835.237 | Photolysis in Air | --- | --- | | Not required |
| 162-1 | 835.42 | Aerobic Soil Metabolism | 46246511 | Proazolthion (proposed) [JAU6476]: Degradation and Metabolism of JAU6476 in Aerobic Soils. | prothioconazole | Acceptable |
| 162-1 | 835.42 | Aerobic Soil Metabolism | 46246512 | Aerobic Degradation of JAU6476 in Two Soils | prothioconazole | Acceptable |
| 162-1 | 835.42 | Aerobic Soil Metabolism | 46246513 | Degradation of JAU6476-desthio (SXX0665) in Four Soils under Aerobic Conditions. | prothioconazole-desthio | Supplemental |
| 162-1 | 835.42 | Aerobic Soil Metabolism | 46246514 | Degradation of JAU6476-S-methyl (WAK7861) in Four Soils Under Aerobic Conditions. | prothioconazole-S-methyl | Supplemental |
| 162-2 | 835.42 | Anaerobic Soil Metabolism | --- | --- | | Not required |
| 162-3 | 835.44 | Anaerobic Aquatic Metabolism | 46246516 | Anaerobic Aquatic Metabolism of JAU6476. | prothioconazole | Acceptable |
| 162-4 | 835.43 | Aerobic Aquatic Metabolism | 46246515 | Aerobic Degradation and Metabolism of the Active Ingredient JAU6476 in the Water/Sediment System | prothioconazole | Supplemental |
| 163-1 | 835.1230 835.1240 | Mobility | 46246450 | Adsorption/Desorption of [phenyl-UL- ¹⁴ C] SXX0665 on Four Different Soils | prothioconazole-desthio | Acceptable |
| 163-1 | 835.1230 835.1240 | Mobility | 46246501 | Adsorption/Desorption of S-methyl-JAU6476 on Four Different Soils. | prothioconazole-S-methyl | Acceptable |
| 163-1 | 835.1230 835.1240 | Mobility | 46246504 | Aged Soil Column Leaching of JAU6476. | prothioconazole | Acceptable |
| 163-1 | 835.1230 835.1240 | Mobility | 46246539 | Leaching behaviour of JAU6476 formulated as 250 EC in soil (parent leaching). | prothioconazole (formulated product) | Supplemental |
| 163-2 | 835.141 | Laboratory Volatility | --- | --- | | Not required |
| 164-1 | 835.61 | Terrestrial Field Dissipation | 46246517 46246518 46246519 | Terrestrial Field Dissipation of JAU6476 in California Soil, 1999. Terrestrial Field Dissipation of JAU6476 in Georgia Soil, 1999. Terrestrial Field Dissipation of JAU6476 in New York Soil, 1999. | prothioconazole (formulated product) | Supplemental Supplemental Supplemental |

| Guideline | | Description | MRID | Title | Substrate | Study Classification |
|-----------|---------|---------------------------------|----------|---|--------------------------------------|----------------------|
| 164-2 | 835.62 | Aquatic Field Dissipation | 46246522 | Aquatic Field Dissipation of JAU6476 in a California Rice Field, 2000. Aquatic Field Dissipation of JAU6476 in an Arkansas Rice Field, 2000. Aquatic Field Dissipation of JAU6476 in a cropped Arkansas Rice Field, 2000. | prothioconazole (formulated product) | Supplemental |
| | | | 46246523 | | | Supplemental |
| | | | 46246524 | | | Supplemental |
| 165-4 | 850.173 | Accumulation in Laboratory Fish | 46246034 | (Carbon 14)-JAU6476-Bioconcentration and Biotransformation in Bluegill (<i>Lepomis macrochirus</i>) Under Flow-Through Conditions. | prothioconazole | Supplemental |
| 165-4 | 850.173 | Accumulation in Laboratory Fish | 46246035 | (Carbon 14)-JAU6476-Desthio - Bioconcentration and Biotransformation in Bluegill (<i>Lepomis macrochirus</i>) Under Flow-Through Conditions. | prothioconazole-desthio | Acceptable |

Table 2. Status of ecological effects data adequacy for prothioconazole.

| Guideline | | Description | MRID | Title | Substrate | Study Classification |
|---------------|---------------|-----------------------|------------------------|---|--------------------|----------------------|
| 71-1 | 850.2100 | Avian acute oral | 462460-36 | Acute oral toxicity study with the Bobwhite | TGAI. | Acceptable |
| | | | 462460-37 | | SXX0665. | Acceptable |
| 71-2 | OECD 205 | Avian acute dietary | 462460-38 462460-39 | A dietary LC50 study with the Northern Bobwhite | TGAI. Desthio.. | Acceptable |
| 71-2 | OECD 205 | Avian acute dietary | 462460-40 | A dietary LC50 study with the Mallard | TGAI. | Acceptable |
| 71-4a | -- | Avian repro | 462460-42 | Avian reproduction study in Northern Bobwhite | TGAI. | Acceptable |
| | | | 462460-43 | | Desthio. No. | Acceptable |
| 71-4b | -- | Avian repro | 462460-44 | Avian reproduction study in Mallard | TGAI. No. | Acceptable |
| | | | 462460-45 | | Desthio. No. | Supplemental |
| 72-1 | | Freshwater fish acute | 462460-18 | An acute toxicity study with the Rainbow trout | TGAI. No. | Acceptable |
| | | | 462460-19 | | 480SC | Acceptable |
| | | | 462460-20 | | SXX0665. No. | Acceptable |
| | | | 462460-21 | | S-methyl. | Acceptable |
| 72-1 | | Freshwater fish acute | 462460-22 | Acute toxicity to Bluegill sunfish | TGAI. | Acceptable |
| | | | 462460-23 | | 480SC | Acceptable |
| Non-guideline | Non-guideline | Freshwater fish acute | 462460-25 | Acute toxicity to common carp | TGAI. No. | Supplemental |
| 72-1a | | Freshwater fish acute | 462460-26 | Acute toxicity to Fathead minnow | Desthio. | Acceptable |

| Guideline | | Description | MRID | Title | Substrate | Study Classification |
|---------------|---------------|--|--|--|--|--|
| 72-1a | | Freshwater fish acute | 462460-24 | Acute toxicity to Golden orfe | SXX0665. | Invalid |
| 72-2 | OECD 202 | Freshwater invertebrate acute | 462460-09 462460-10 462460-11 462460-12 | An acute toxicity study with the daphnid | TGAI. No. 480SC. SXX0665. S-methyl. | Acceptable Acceptable Supplemental Acceptable |
| Non-guideline | Non-guideline | | 462460-13 | Acute toxicity study with crayfish | Desthio. No | Invalid |
| 72-3a | | Estuarine/ marine fish acute | 462460-27 | Acute toxicity study with the Sheepshead minnow | TGAI | Acceptable |
| 72-3b | | Oyster shell deposition | 462460-14 | Acute toxicity to Eastern Oyster | TGAI | Acceptable |
| 72-3c | | Estuarine/ marine invertebrate acute | 462460-16 462460-17 | Acute toxicity to Mysids | TGAI. No. Desthio. No. | Acceptable Acceptable |
| 72-4a | | Fish early life stage | 462460-31 462460-32 | Toxicity to the early life stages of the Rainbow trout | TGAI Desthio | Invalid Invalid |
| 72-4b | | Freshwater invertebrate life cycle | 462460-28 462460-29 | 21-d chronic toxicity with the Daphnid | TGAI Desthio | Acceptable Acceptable |
| 72-4c | | Estuarine/ marine invertebrate life cycle | 462460-30 | Life cycle toxicity test with the Mysid | Desthio. No. | Acceptable |
| 72-5 | | Estuarine/ marine fish life cycle | 462460-33 | Life-cycle toxicity test with the Fathead minnow | Desthio | Supplemental |
| 122-1 | | Non-target plants seedling emergence/vegetative vigor | 462460-49 | Tier I seedling emergence/vegetative vigor | 480SC | Acceptable |
| 123-2a | | Non-target plants, Tier II seedling emergence | 462460-50 | Tier II seedling emergence | 480SC | Acceptable |
| 123-2 | | Non-target plants; aquatic vascular plant toxicity test | 462461-01 462461-02 462461-04 | Toxicity to duckweed | TGAI 480SC. Desthio | Acceptable Acceptable Acceptable |
| 123-2 | | Non-target plants; freshwater non-vascular plant toxicity test | 462461-09 | Acute toxicity to the freshwater diatom | TGAI | Acceptable |

| Guideline | | Description | MRID | Title | Substrate | Study Classification |
|-----------|--|--|-------------------------------------|---|-----------------------------------|--|
| 123-2 | | Non-target plants; marine non-vascular plant toxicity test | 462461-10 | Growth inhibition test with the marine diatom | TGAI | Acceptable |
| 123-2 | | Non-target plants; freshwater non-vascular plant toxicity test | 462461-05 462461-07 462461-08 | Growth inhibition test with freshwater blue-green alga | TGAI S-methyl. SXX0665. No. | Acceptable Supplemental Acceptable |
| 123-3 | | Non-target plants; freshwater non-vascular plant toxicity test | 462461-03 462461-06 | Toxicity to the freshwater green alga | TGAI 480SC | Acceptable Acceptable |
| 141-1 | | Non-target insect contact toxicity test | 462460-46 462460-48 | Acute oral and contact toxicity tests with the honeybee | 480SC TGAI | Acceptable Acceptable |
| N/A | | Sediment-dwelling invertebrate toxicity test | 462461-31 462461-32 | Development and emergence of Chironomus larvae | TGAI SXX0665 | Supplemental Supplemental |
| | | | | | | |