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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Memorandum

From: Larry Turner, Ph. D. /s/ 12-1-03
Environmental Field Branch
Field and External Affairs Division

To: Arthur-Jean Williams, Chief
Environmental Field Branch
Field and External Affairs Division

Subject: Effects Determination for Chlorothalonil for Certain Pacific Anadromous Salmonids

I reviewed data and other information for chlorothalonil, a registered fungicide named by the Washington Toxics Coalition (WTC) and included in the court order for 'effects determinations' and potential consultation with the National Marine Fisheries Service. Chlorothalonil is registered nationally for use on a wide variety of agricultural crops; commercial turf and ornamental operations; home gardens and ornamentals (but not lawns), and other uses. The Environmental Fate and Effects Division (EFED) has completed an environmental risk assessment for a "Reregistration Eligibility Decision (RED) Chlorothalonil" issued in April, 1999. The assessment concludes that levels of concern are exceeded for endangered freshwater fish and aquatic invertebrates exposed to runoff and drift from agricultural and turf treatment sites.

I have adapted the more general findings of the EFED assessment to develop an analysis of the potential for effects on endangered and threatened Pacific salmon and steelhead Evolutionary Significant Units (ESUs) from current uses in California and the Pacific Northwest. My analysis addresses changes in uses and rates that have been put on most labels since the RED was developed. EFED has also developed new EECs for selected use sites that correspond with these changes. OPP's levels of concern are exceeded for direct acute risks and chronic risks from some uses to endangered fish. Some uses also exceed criteria for populations of aquatic invertebrates that may be food for fish. Levels of concern are not exceeded for risk to aquatic vascular plants that may serve as cover for fish.. There are a number of mitigating factors that reduce many, but not all concerns.

Based upon the available information, I determined that some use of chlorothalonil on crops and certain non-crop sites may affect 9 ESUs under labeled application directions, may affect but is not likely to adversely affect 11 ESUs, and will have no effect on 6 ESUs. Potential effects are limited and any that occur are likely only in breeding and rearing areas. No effects are expected from home and garden use or for use on golf course tees and greens, and no chronic effects are expected for any use. The additive use of chlorothalonil to control mildew and fungi in paints and other products will have no effect.

attachment:

Chlorothalonil: Analysis of Risks to Endangered and Threatened Salmon and Steelhead
(with attachments)