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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Memorandum

From: Michael Patterson, Ph. D. */s/* 3-31-04
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 Methamidophos for Pacific Anadromous Salmonids

I reviewed data and other information for methamidophos, an organophosphate, restricted use, insecticide 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. Methamidophos is registered nationally for use on relatively few crops. In Idaho, Oregon, and Washington it is used only on potato. In Califonia it is used on potato, alfalfa for seed, and tomatoes under SLN's CA78016300 and CA79009600. There are no residential applications.

The Environmental Fate and Effects Division (EFED) has completed an environmental risk assessment for an Interim Reregistration Eligibility Decision (IRED) issued April 7, 2002. The assessment concludes that endangered species levels of concern are exceeded for aquatic invertebrates exposed to runoff and drift from applicationns to tomato. Levels of concern were not exceeded for fish at any site. We 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.

Based on the environmental risk assessment and additional considerations indicated in our analysis and other attached or referenced materials, we conclude that the use of methamidophos may affect, but is not likely to adverse affect, 3 salmon and steelhead ESUs and will have no effect on 23 ESUs . Our determinations are based on the known or potential use of methamidophos on crops within habitats and migration corridors of each ESU, the acute risk of methamidophos to endangered fish, and the potential for indirect effects due to acute risks to their aquatic-invertebrate food supply.

attachments