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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

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Memorandum

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To: Arthur-Jean Williams, Chief
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Subject: Effects Determination for Prometryn for Pacific Anadromous Salmonids

We reviewed data and other information for prometryn, a pesticide 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. A Reregistration Eligibility Decision (RED) for prometryn was published in April of 1995. Currently, the major uses of prometryn are weed control in cotton, celery (California and Florida only), parsley (California only), dill (California only), and pigeon peas (Puerto Rico only). We have adapted the more general findings of the RED to develop an analysis of the potential for effects on endangered and threatened Pacific salmon and steelhead Evolutionary Significant Units (ESUs) from current uses. We also have sought new information and revised aquatic estimated environmental concentrations and aquatic risk quotients for fish and vascular aquatic plants since the RED was developed. OPP's levels of concern are not exceeded for risks to aquatic animals but are exceeded for risk to aquatic plants; therefore, a potential exists for adverse affects to cover plants used by salmon and steelhead.

Based on the RED and additional considerations indicated in our analysis and other attached or referenced materials, we conclude that the use of prometryn will have no effect on 17 salmon and steelhead ESUs but may affect nine ESUs. We propose that if OPP adopts a no-spray buffer between sites where prometryn may be used and sites where salmon and steelhead occur, jeopardy would be avoided and take would most likely be eliminated.