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

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OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Memorandum

From: Larry Turner, Ph.D.
Environmental Field Branch
Office of Pesticide Programs

To: Arthur-Jean Williams, Chief
Environmental Field Branch
Office of Pesticide Programs

Subject: No-Effect Determination for Simazine for Pacific Anadromous Salmonids

I have reviewed the available data and other information for simazine and its potential effects on Pacific anadromous salmonid and their critical habitat. Simazine was cited by the Washington Toxics Coalition (WTC) as a pesticide they believe warrants review. In addition, simazine was cited by the Californians for Alternatives to Toxics (CATS) as a pesticide they believe warranted review, with special emphasis on the use of simazine for wine grapes, lemons, and almonds, and the salmonid Evolutionarily Significant Units (ESUs) associated with these uses.

I have concluded that simazine will have no effect on any of the listed or proposed ESUs of Pacific salmon and steelhead. Although there is moderate usage of simazine, e.g., over 500,000 pounds of active ingredient in 2001 in California, and it is frequently detected in NAWQA samples, a comparison of the toxicity of simazine and the likely environmental concentrations derived from standard models indicates that those concentration are below the Levels of Concern for the salmon and steelhead ESUs. Details are presented in the attached simazine analysis.

The simazine analysis is more expansive than our typical no effect determinations because there was no reregistration assessment to use as a basis. Therefore, we had to work with Environmental Fate and Effects Division scientists to develop an appropriate risk assessment. While it was fairly obvious rather quickly that there would be no direct concerns to fish, we needed to look at PRZM/EXAMS modeling results before we could also ascertain that there would be no indirect effect on these fish as a result of effects on the aquatic plants that could provide cover. As a result, the attached analysis more resembles those where we have made "may affect" determinations than where we have previously made no effect determinations.

Attachment