EEB BRANCH REVIEW

DATE: IN 3/5/81  OUT 3/12/81

FILE OR REG. NO. 81- TX-08

PETITION OR EXP. PERMIT NO.

DATE OF SUBMISSION 1/81

DATE RECEIVED BY HED 3/5/81

RD REQUESTED COMPLETION DATE 3/21/81

EEB ESTIMATED COMPLETION DATE

RD ACTION CODE/TYPE OF REVIEW 510/Section 18

TYPE PRODUCT(S): I, D, H, F, N, R, S Insecticide

DATA ACCESSION NO(S).

PRODUCT MANAGER NO. D. Stubbs (41)

PRODUCT NAME(S) Temik 15G

COMPANY NAME Union Carbide

SUBMISSION PURPOSE Emergency Response Section of RD requests development of monitoring program by EEB

SHAUGHNESSEY NO. CHEMICAL, & FORMULATION Z A.I.
As per item #11 of Mr. Johnson's 2/24/81 telegram to Region VI granting a Sec. 18 for use of aldicarb on grapefruit, EEB has made arrangements for fulfilling the monitoring condition imposed by Mr. Johnson in item 11 of said telegram. This will aid us in assessing the hazards to the Brown Shrimp Fishery in the Laguna Madre Bay.

As per the attached "Report of telephone conversation", Mr. David Ivie and Mr. Jack Bomer of the Texas Dept. of Agriculture were consulted. Texas officials will ask the Union Carbide Corp. to continue the efforts of the 1980 aldicarb monitoring program in Cameron, Hidalgo, and Willacy counties, Texas. The program will be conducted in as much similarity as possible to the 1980 program reported to E.P.A. by Union Carbide under Accession #24409, dated 1/15/81 and entitled "Monitoring Aldicarb Residues in Soil and Water, 1980. A Report to E.P.A." The major difference this year will be that sampling will commence as soon as possible (April, 1981) to coincide with the first aldicarb applications to citrus. In addition, pre-application sampling will be done and several samples will be taken from the surface-water resources of the Laguna Atascosa National Wildlife refuge. Texas will duplicate laboratory analyses.

EEB concerns include only surface water drainage as relates to the possible contamination of the Laguna Madre Bay. EEB defers to EFB and Toxicology Branches, HED, on matters of groundwater contamination and/or human health and safety.

Texas officials request clarification and specification of monitoring requirements to support a Section 3 Registration of the grapefruit use pattern. EEB defers to EFB on this matter.
Pursuant to Mr. Ed. Johnson's Telegram (dated 2/24/81) to Region VI granting the 1981 Sec. 18 for use of TEMIK on grapefruit in S.E. Texas, I called to arrange for monitoring of surface water drainage leading to the Laguna Madre Bay, for aldicarb and metabolites.

I explained that I thought last year's Union Carbide study was a fine model to follow this year but that it had started too late to assess hazards to Brown shrimp from aldicarb reaching the Bay. Basically we agreed that the same program should be performed in '81 to fulfill Mr. Johnson's condition for monitoring, but that sampling should commence in April, '81, shortly after the 1st applications to citrus. '81 sampling will include pre-application samples and sampling within the Laguna Atascosa National Wildlife Refuge. Union Carbide will probably do the work with Texas duplicating the lab analyses.

I stressed that this monitoring is requested as a condition of the Sec. 18, included by Mr. Johnson. These data would not necessarily satisfy Sec. 3 requirements. Since they intend on applying for a Sec. 3 for grapefruits, they wanted to know what specific data requirements will be for monitoring. I said I could not tell them (since this is EFB's work) but that I would alert the PM to their concerns.

They asked about appropriate groundwater monitoring but I said that this was not an EEB concern for the Sec. 18 and I therefore would not comment on it. I mentioned that EEB's specific concerns with the Sec. 18 were surface water drainages leading to the Laguna Madre Bay and Shrimp Fishery.
1. Chemical Name: Aldicarb

2. Identifying Number: 81-TX-08
3. Action Code: 510
4. Accession Number:

5. Record Number: 28546
6. *Reference No.:

7. Date Received (EPA): 01/14/81
8. Date Sent to RPD (to be completed by RPD): 3/1/81
9. Statutory Due Date (45 days) (90 days) (120 days):
10. Projected Return Date: 3/1/81
11. Product Manager: Housen
12. Product Manager Team Number:

13. Instructions to RPD Reviewer:
   - Total Assessment - 3(c)(5)
   - Incremental Risk Assessment - 3(c)(7) and/or E.L. Johnson memo of May 12, 1977.
   - Other - (Explained below)

Please develop a monitoring program for this specific exemption recently issued. Refer to item 11 of the attached telegram. Please note E. Johnson's note that we will work with TX officials to develop details of this program. Any questions or additional information should be directed to Jack Housen.

15. Yes any or all available information:  
   - Use only excerpted data.
   - Use only the excerpted data for formulation and any or all available information on the technical or manufacturing chemical.

16. Revisions Sent to: TX  MD  KS  OK  TX  CO

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19. Local Inspected with Application Attached:
20. Confidential Statement of Formulation Attached:
21. Representative Labels Showing Accepted Date Attached:
22. Date Returned to RPD (to be completed by RPD):

Include an original and 3 copies of this completed form for each branch checked for review.

* For use by FM only.