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

MEMORANDUM FEB - 9 1983

TO: Jay Ellenberger
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OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

THRU: Raymond W. Matheny RWM
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SUBJECT: Data Required to Support the Conditional Registration of Temik 10G/15G (EPA Reg. #264-330/264-331)

In the subject letter (Accession #83516/83517), the registrant (Union Carbide Agricultural Products Company) has agreed to conduct the non-target fish and wildlife testing needed to support the conditional registration of Aldicarb 15G/10G. The rationales underlying the need for Tier II testing are presented in three (3) earlier branch reviews (Bowen, 2/20/82; Bowen 07/26/82; Peer group memo 04/15/82).

The Ecological Effects Branch (EEB) concurs with the registrant's proposal to conduct field searches and monitoring studies that will quantify Aldicarb's impact on non-target fish and wildlife. EEB is looking forward to reviewing protocols for both of these studies.

However, there appears to be some confusion as to the nature of the aquatic testing needed to support conditional registration. In an effort to avoid further confusion, I will again outline EEB's position on the aquatic testing required (Peer group memo 4/15/83):

1. Repeat the 96 hour acute $LC_{50}$ for bluegill sunfish, in order to eliminate the question concerning the previously submitted supplemental test.

2. After an acceptable 96 hour acute $LC_{50}$ study has been submitted, require the embryo-larvae study on either the bluegill or rainbow trout, whichever is most sensitive.

3. An aquatic invertebrate life cycle test.

The registrant's proposal to conduct aquatic invertebrate life cycle and fish embryo larvae studies at levels based solely upon the result of company field monitoring is unacceptable. Chronic data (i.e., effect

level/no observable effect level ) are needed to complete an incremental risk assessment (3(c)(7) finding) for the proposed conditional registration of Aldicarb on field corn, sorghum, citrus (grapefruit, lemons, limes), and tomatoes. Bioassays of the nature proposed by the registrant will not provide the information needed and, as such, could not be used in support of product registration.

Acceptable protocols for successfully conducting these types of bioassays are outlined in Subpart E, Section 163.72-4 of the 1978 guidelines.

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