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RECORD NO.

100601
SHAUGHNESSEY NO.

REVIEW NO.

EEB REVIEW

DATE: IN 4-18-88 OUT 20 APR 1988

FILE OR REG. NO 88-OH-03
PETITION OR EXP. NO. _____
DATE OF SUBMISSION 3-25-88
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TYPE PRODUCT(S) : I, D, H, F, N, R, S Nematicide

DATA ACCESSION NO(S). _____

PRODUCT MANAGER NO. D. Stubbs (41)

PRODUCT NAME(S) Nemacur 3 (Fenamiphos)

COMPANY NAME Ohio Department of Agriculture

SUBMISSION PURPOSE Proposed Section 18 for use on blueberries

SHAUGHNESSEY NO.	CHEMICAL, & FORMULATION	% A.I.
<u>100601</u>	<u>Fenamiphos</u>	<u>35%</u>
_____	_____	_____
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_____	_____	_____

EEB REVIEW

Chemical: Nema-cur 3 (fenamiphos)

100 Submission Purpose and Label Information

100.1 Submission Purpose and Pesticide Use

The State of Ohio is requesting an emergency exemption (Section 18) for the use of Nema-cur to control nematodes in blueberries. No data were submitted with this request.

100.2 Formulation Information

Active ingredient:
Fenamiphos 35%
Inert ingredients 65%

Contains 3 lb of active ingredient per gallon.

100.3 Application Methods, Directions, Rates

Application Information

As an emergency treatment for established blueberries on the Jonathan Ford farm in Trumbull County, Ohio, 2 gal/A Nema-cur 3 SC (6 lb ai/A) will be applied in the spring before bloom (94 days before harvest) and at the same rate in the summer following harvest. A total of 12 lb ai/A will be used in the 12-month period for which the emergency exemption is sought.

Nema-cur 3 SC will be applied to affected areas by drip irrigation. The irrigation system will be run for 2 days prior to chemical application with fresh water to establish wetted zones in the soil. Two days later Nema-cur 3 SC will be injected for one hour into the irrigation system. Thereafter, the system will be run for 90 minutes with fresh water to force all Nema-cur-containing water from the system.

100.4 Target Organisms

Target organisms are plant-parasitic nematodes: Pratylenchus penetrans, P. vulvulus, and Xiphinema americanum.

100.5 Precautionary Labeling

No labeling was provided with this submission.

101 Hazard Assessment

101.1 Discussion

The state of Ohio is requesting an emergency exemption for use in blueberries. Application under this exemption would be limited to one 16.8-acre planting in Trumbull County, Ohio. Proposed application rate is 2 gal. Nemacur 3 SC (6 lb ai) per acre, with a maximum of 4 gal. formulation per acre in a season. Application will be by drip irrigation only.

101.2 Likelihood of Adverse Effects on Nontarget Organisms

Data from previous EEB reviews indicate that fenamiphos is highly toxic to birds, mammals, freshwater fish, and honey bees. No data are available on toxicity to freshwater aquatic invertebrates.

Use at the proposed rate of 6 lb ai/A is likely to result in residues on terrestrial food items and in freshwater habitats which exceed levels of concern for nontarget organisms. However, hazard to nontargets from the proposed use is mitigated by the following factors:

- 1) Application will be by drip irrigation only. This eliminates drift as a factor and significantly limits the area of potential exposure for terrestrial organisms.
- 2) The proposed exemption is for use on only 16.8 acres. The small size of the area subject to application also significantly limits the area of potential exposure.

In view of these factors, use of Nemacur under the conditions of the proposed exemption should not result in significant adverse effects on nontarget organisms.

101.3 Endangered Species Considerations

On the basis of information in its Endangered Species files, EEB has determined that use in blueberries in Ohio will not result in exposure of endangered species.

101.4 Adequacy of Toxicity Data

The toxicity database is inadequate, and a complete hazard assessment cannot be made at this time. The Fenamiphos Registration Standard ~~will~~^{has} address~~ed~~ the data gaps and the associated requirements.

103 Conclusions

EEB has reviewed the proposed emergency exemption for the use of NemaCur 3 SC in Ohio. Proposed use should not result in significant hazard to nontarget terrestrial or aquatic organisms, due to application method (drip irrigation only), and due to the fact that area of application is limited to a total of 16.8 acres.

There are no federally listed endangered species in Ohio that will be adversely affected by this use.

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