MEMORANDUM

SUBJECT: Terbufos FRSTR: Resolution of Re-entry Issues

FROM: Kyle Barbehenn
Science Integration and Policy Staff
Hazard Evaluation Division (TS-769C)

TO: William Miller, PM-16
Registration Division (TS-767C)

THRU: Amy S. Rispin, Chief
Science Integration and Management Staff
Hazard Evaluation Division (TS-769C)

Granular terbufos is typically applied in-furrow by
certified applicators and our cover memo (December 11, 1987)
indicated the need for protective clothing and a reentry
interval (7 days) associated with that method of application.
However, since some labels for special local needs allowed for
broadcast treatments, we also indicated a need to re-examine the
reentry issue. We have now evaluated new data on exposure to
corn scouts (Adams review, 3/9/88) and consulted with TOX Branch
as per EAB's deferral (Levy memo 3/25/88). HED's conclusions to
be incorporated into the FRSTR are as follows:

EAB compared estimated exposure to corn scouts with a NOEL
from a dog feeding study. This comparison indicated that a safe
reentry interval after broadcast treatments could not be
established. However, a special 21-day dermal toxicity study
establishing NOEL's for ChE inhibition is necessary to provide a
more appropriate comparison with expected exposure.

As an interim measure, scouts may enter aerially treated
fields if they wear appropriate protective clothing.
However, use of broadcast treatments for seed corn crops should
be prohibited until after any detasseling operations.

If registrants wish to use terbufos broadcast in areas more
arid than Nebraska, such as in the Southwest, additional data on
dislodgeable residues will be required.

Copies of relevant documents are attached. This completes
HED's Phase II for terbufos.

attachments

cc: Jim Adams, EAB
   Quang Bui, TOX