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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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MEMORANDUM

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

SUBJECT: Terbufos FRSTR: Resolution of Re-entry Issues

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Granular terbufos is typically applied in-furrow by certified applicators and our cover memo (December 11, 1987) indicated the needs 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