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

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OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Terbufos Section 18 in North Dakota - ACTION MEMORANDUM.

FROM: David Warburton  
Ecological Effects Branch *David Warburton 2/16/89*  
Environmental Fate and Effects Division (TS-769C)

THRU: Douglas J. Urban, Supervisory Biologist  
Ecological Effects Branch *Douglas J. Urban 2/16/89*  
Environmental Fate and Effects Division (TS-769C)

THRU: James W. Akerman, Chief *J.W. Akerman 2/16/89*  
Ecological Effects Branch  
Environmental Fate and Effects Division (TS-769C)

TO: Gene Asbury  
Emergency Response Branch  
Registration Division (TS-767C)

I have reviewed the ACTION MEMORANDUM for the Section 18 for use of terbufos (Counter 5G) on rape and mustard seed in North Dakota, as you requested. The ecological effects concerns presented in the ACTION MEMORANDUM are consistent with the EEB review of 2/6/89 with the following exceptions:

- 1) Page 4, second paragraph - I do not understand nor know the basis of the sentence: "These counties have pesticide use restrictions designed to protect the Piping Plover which provides for a 1/2-mile buffer in any "A" site (area where pesticides use restrictions for protection of endangered species apply)."
- 2) Page 6, item 4 - Regarding "recommended label restrictions", the required ecological label statement identified in the correspondence to North Dakota Department of Agriculture (p. 2) reflects only endangered species concerns, but not other critical nontarget concerns (waterfowl, shorebirds). Also, I do not understand the sentence: "Additionally, this use of a 5% a.i. product on rape and mustard represents approximately 1/7th of the use already authorized for corn, sugar beets and sorghum." or how it applies to ecological effects.

These comments are provided for your consideration. If I can be of further assistance please contact me (557-7358).