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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
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OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

DEC 31 1987

MEMORANDUM

SUBJECT: Proposed Waiver of Requirement for Aquatic Residue  
Monitoring; Reg No: 45639-EUP-GL; Record No: 209990

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TO: Dennis Edwards, PM 12  
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With this submission the registrant, Nor-Am, is requesting a waiver of the requirement for aquatic residue monitoring. This was discussed in a meeting between Daniel Rieder of EEB and Paula Paul of Nor-Am in November, 1987. In that meeting Dan recommended that Nor-Am delay residue monitoring until environmental fate information has been provided and evaluated.

According to the draft Registration Standard on Amitraz, 9-10-87, the following environmental fate studies are still outstanding.

- 1) 161-1 Hydrolysis
- 2) 161-2 Photodegradation in water
- 3) 161-3 Photodegradation on soil
- 4) 162-1 Aerobic soil metabolism
- 5) 162-2 Anaerobic soil metabolism
- 6) 163-1 Leaching and Adsorption/Desorption
- 7) 163-2 Volatility (Laboratory)
- 8) 163-3 Volatility (Field)
- 9) 164-1 Field soil dissipation study
- 10) 165-4 Fish accumulation studies
- 11) 165-5 Aquatic non-target organism accumulation

The following ecological effects studies were also required according to that draft standard.

- 1) 71-2 Avian reproduction with upland gamebird (TGAI)
- 2) 72-1 Acute toxicity with coldwater fish (TEP)
- 3) 72-1 Acute toxicity with warmwater fish (TGAI)
- 4) 72-2 Acute toxicity with aquatic inv. (TEP)
- 5) 72-3 Acute toxicity with estuarine fish (TGAI)
- 6) 72-4 Fish early life stage (TGAI)
- 7) 72-4 Aquatic invertebrate life cycle (TGAI)

In that standard, it was also indicated that field testing requirements were reserved pending receipt of environmental fate information. Even though amitraz was not registered on apples and citrus at the time EEB wrote their chapter (1983), their assessment and data requirements included those uses since they were proposed. Therefore, to be consistent with that standard, EEB is recommending that the requirement for residue monitoring be reserved until EAB has received and evaluated the forth coming fate information. We also recommend that if and when monitoring is required, it be designed to accommodate as many crops as possible. This includes not only registered crops, but also proposed uses.

This is not, however, considered granting a waiver, as such. All available information suggest that some sort of field testing will be required, whether to evaluate exposure (residue monitoring) or effects (biological field testing). The request for residue monitoring in the June 26, 1987 EUP review was based on the estimation that residues in estuaries or streams adjacent to treated citrus groves would likely exceed acute effect levels for aquatic invertebrate and possibly fish. It was considered a cost efficient alternative for the registrant to perform monitoring during an EUP program rather than initiate an entirely new program specifically for aquatic residue monitoring. However, the additional fate information would be useful in better defining the purpose of such testing and in developing the protocol(s). When the additional information has been submitted and evaluated, EEB will indicate if field testing is required. If it is, we will provide guidance on what crops to be monitored/tested and whether residue monitoring or biological testing (or both) would be required.