US EPA ARCHIVE DOCUMENT

September 16, 1980

EEB Comments on drafts of Registration Standards for Metolachlor and Aspon

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The following comments are recommended to revise the Metolachlor and Aspon Standards.

Aspon

pg 59. Modify: "two species of birds" to read "one bird species."

pg 121. Delete: "These data are not.... Nevertheless,"

Metolachlor

pg 98. Modify the portion of the first paragraph: "In comparison with the controls....metabolize or eliminate Metalachlor." to read as follows:

"In comparison with the controls, bobwhite quail exposed to 10, 300 and 1000 ppm technical Metachlor - sp for 17 weeks, produced significantly fewer chicks surviving to 14 days. See Table 1."

Table 1

Summary of Reproductive Success of Quail Exposed to Metolachlor for 16-weeks

Pesticide Concentration (PPM)	Percent Survival	Chi-Square[2]	DF	Significance Level
Control	58.8%	-	-	-
10	47.0%	22.35	1	>0.001
300	37.0%	62.4	1	>0.001
1000	41.5%	44.5	1	>0.001

HCraven:dmf:9/17/80:TS-769:CM-2:Rm807:X70320

[1]The number of chicks surviving to age 14 days expressed as a percentage of the eggs laid.

[2]Chisquare calculated by 2x2 Contingency Table anaysis of treatment vs. control group survival.

pg 98 (continued)
redesignate table 1. as table 2.

Modify the statement: "Unlike the quail, the ducks... or 1000 ppm."

to read as follows:

"In comparison with the controls, mallard ducks exposed to 10 and 1000 ppm technical Metolachlor for 17 weeks produced significantly fewer chicks surviving to 14 days. See Table 3."

Table 3

Summary of Reproductive Success of Mallards Exposed to Metolachlor for 16-weeks

Dietary Pesticide Concentration (ppm)	Percent Survival[1]	Chi-Square[2]	DF	Significance Level
Control	57.0%	-	-	-
10	48.0%	11.29	1	>0.001
300	57.6	0.053	1	NS
1000	51.0%	5.26	1	>0.025

[1]The number of ducklings surviving to age 14 days expressed as a percentage of the eggs laid.

[2]Chisquare calculated by 2x2 contingency table analysis of treatment vs. control group survival.

pg. 98 (continued)

redesignate table 2 as table 4.

pg. 101. Modify the third paragraph from:

"Also, a dietary . concentration between 300 and 1000 ppm." to read as follows:

"However, in reproduction studies, Bobwhite quail, and Mallard ducks fed 10 ppm in their diet for 17 weeks experienced significant ($p<0.001$) reproductive impairment-fewer chicks surviving to 14 days. Ten parts per million was the lowest of three concentrations tested, therefore a no-effect level has not been established."

pg. 101 5th paragraph, 1st sentence

insert the word <u>acutely</u> between <u>most</u> and <u>sensitive</u>

pg. 102 2nd paragraph, last line.

- insert the word <u>acute</u> between <u>significant</u> and <u>effects</u>

- delete the word <u>mortality</u> at the end of the sentence.

3rd paragraph

Modify the last sentence to read "However, as concerns reproductive effects to birds, data have indicated reproductive effects at 10 ppm dietary exposure. The presently available exposure information is not sufficient to conclude that a harmful exposure level will occur in Metolachlor treated fields."

pg 103. Last paragraph

- delete the phrases refering to runoff and drift.