

US EPA ARCHIVE DOCUMENT

OK
122010-2

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SHAUGHNESSEY NO.

REVIEW NO.

EEB REVIEW

DATE: IN 7-11-85 OUT OCT 21 1985

FILE OR REG. NO. 352-EUP-116

PETITION OR EXP. NO. _____

DATE OF SUBMISSION 5-1-85

DATE RECEIVED BY HED 7-8-85

RD REQUESTED COMPLETION DATE 9-23-85

EEB ESTIMATED COMPLETION DATE 9-16-85

RD ACTION CODE/TYPE OF REVIEW 704/EUP

TYPE PRODUCT(S): I, D, H, F, N, R, S Herbicide

DATA ACCESSION NO(S). _____

PRODUCT MANAGER NO. R. Taylor (25)

PRODUCT NAME(S) Escort

COMPANY NAME E.I. du Pont de Nemours & Company

SUBMISSION PURPOSE Proposed EUP expansion to include use as a
site preparation and conifer release
herbicide

SHAUGHNESSEY NO.	CHEMICAL & FORMULATION	% A.I.
<u>122010-2</u>	<u>Methyl 2-[[[(4-methoxy-6-methyl-</u>	
	<u>1,3,5-triazine-2-yl)-amino]carbonyl]</u>	
	<u>amino]sulfonyl]benzoate</u>	<u>60</u>

EEB REVIEW

100.0 Submission Purpose and Label Information

100.1 Submission Purpose and Pesticide Use
(excerpted from Dupont's letter of May 1, 1985)

On 4-30-85, the Agency approved a one-year extension of the subject EUP to become effective on May 1, 1985. During the previous year, information developed under research testing and under the existing EUP program for brush control indicated that "Escort" may be well suited for use in forestry as a site preparation and conifer release herbicide. Accordingly, we wish to expand the Experimental Program for the recently extended subject EUP to allow developmental testing in forestry.

To accomplish this objective, we request the addition of 36 acres (from 3910 acres on the existing EUP extension to 3946 acres in the enclosed revision) and 60 pounds of active ingredient (from 238 pounds on the existing EUP extension to 298 pounds on the enclosed revision). These additions will be distributed among eight states. A comparison of pound/acreage distribution among states is presented below with those states affected by the requested change designated by asterisk (See Attachment I).

100.2 Formulation Information (excerpted from the label)

ACTIVE INGREDIENT:

Methyl 2-[[[(4-methoxy-6-methyl-1,3,5-triazine-2-yl)-amino] carbonyl] amino] sulfuronyl] benzoate.....60%

INERT INGREDIENTS40%

100.3 Application Methods, Directions, Rates

100.4 Target Organisms

100.5 Precautionary Labeling

(See attached label for these items.)

101.0 Hazard Assessment101.1 Discussion

As shown in previous reviews, metsulfuron methyl falls into the practically nontoxic category for birds, fish, mammalian, and aquatic invertebrate studies (Fite: April 14, 1983). In addition a relatively small application rate, 0.8 ounces product per acre (0.03 lbs ai/acre) is used.

As per Fite's (April 14, 1983) review the following paragraphs would also be applied to the expected hazard to this EUP for forestry uses:

Some concern of potential chronic problems are raised due to the indication that DPX-T6376 could be relatively stable in the environment. Hydrolysis test showed the half-life to range from 2 hours at 45°C, pH 2, to stable at 25°C and pHs of 7 and 9. However, an evaluation of this aspect of DPX-T6376 must be deferred until an environmental fate profile is completed by the Exposure Assessment Branch (EAB).

However, as pointed out in Fite's review this concern is mitigated by minimal amount of acreage involved (36 acres). Based on this, minimal hazard is expected to nontarget organisms.

101.2 Endangered Species Consideration

In response to EEB request for consultation on forest pesticides the following plants were identified by the Office of Endangered Species (OES) for the States that were indicated in this EUP:

Alabama

Green pitcher plant - Counties: Cherokee, DeKalb,
Jackson, Marshall

Florida

Chapman rhododendron - Counties: Clay, Gulf,
Gadsden, Liberty

Florida torreyia - Counties: Jackson, Gadsden,
Liberty

Georgia

Hairy rattleweed - Counties: Wayne and Brantley
Persistent trillum - Counties: Rabun, Habersham,
Stephans
Green pitcher plant - Towns County

South Carolina

Small whorled pogonia - Oconee County

Persistent trillium - Oconee County

Therefore, the use of a herbicide in forested areas of these States would be expected to eliminate or damage these plants.

Furthermore, EEB files indicate we did not review the initial Escort EUP for noncropland areas. This is unfortunate since OES indicated jeopardy may occur for several plant species from the use of a herbicide in these areas (see Attachment II).

The following list of plants and locations were identified by OES in their letter of June 30, 1983, in connection with the Oust consultation for noncropland (rights-of-way and ditch banks) use:

Arizona

Brady pincushion cactus - Coconino county

Peeples Navajo cactus - Navajo county

California

Contra Costa wall flower

and Antioch Dunes evening primrose - Contra Costa county

Solano grass - Solano county

Salt marsh bird's beak - Counties: Santa Barbara, Ventura, Los Angeles, Orange, and San Diego

Colorado

Mesa Verde cactus - Counties: Montezuma and Montrose

Uinta Basin hookless cactus - Delta county

Florida

Chapman rhododendron - Counties: Clay, Gulf, and Gadsden

Harper's beauty - Counties: Franklin and Liberty

Georgia

Hairy rattleweed - Counties: Wayne and Brantley

Idaho

MacFarlane's four-o'clock - Idaho county

Iowa

Northern wild monkshood - Counties Allamakee,
Clayton, and Jackson

New Mexico

Kuenzler hedgehog cactus - Counties: Otero,
Chaves and Lincoln

Sneed pincushion cactus - Dona Ana county

Gypsum wild buckwheat - Eddy county

New York

Northern wild monkshood - Ulster county

North Carolina

Bunched arrowhead - Henderson county

Oregon

Malheur wire-lettuce - Harney county

South Carolina

Bunched arrowhead - Greenville county

Texas

Lloyd's hedgehog cactus - Pecos county

Sneed pincushion cactus - El Paso county

Texas poppy-mallow - Runnels county

Utah

Wright fishhook cactus - Counties: Emery and
Wayne

Dwarf bear-poppy - Washington county

Phacelia - Utah county

Rydberg milk-vetch - Counties: Piute and
Garfield

On June 30, 1985, OES provided the following
additional species to the above list:

California

Large-flowered fiddleneck - San Joaquin county

Slender-petaled mustard - San Bernardino
county

Pedate checker-mallow - San Bernardino county

San Benito evening primrose - San Benito
county

Ash Meadows gumplant - Inyo county

Amargosa niterwort - Inyo county

Colorado

Mancos milk-vetch - Navajo Indian Reservation

Florida

Euphorbia deltoidea ssp. deltoidea - Dade county

Euphorbia garberi - Counties: Dade and Monroe

Crenulate lead-plant - Dade county

Small's milkpea - Dade county

Tiny polygala - Dade county

Nevada

Ash Meadows gumplant - Nye county

Amargosa niterwort - Nye county

Centaurium namophilum - Nye county

Therefore, in order to protect these endangered species EEB is requiring that Escort not be used in any of these counties for noncropland or forestry uses. In the event it is impossible to change the test site, the Endangered Species Specialist of the appropriate Regional Office of the U.S. Fish and Wildlife Service must be contacted.

The September 25, 1985, (See attachment III) letter from Dupont only restricts use in counties identified by the Oust consultation. The forestry uses and the additional noncropland endangered species are not represented in their letter. Also, the letter did not indicate the noncropland portion of the EUP.

101.3 Adequacy of Toxicity Data

The basic six wildlife and aquatic organism studies satisfy the guidelines requirements. Pending fulfillment of the environmental fate studies, further tests may be needed to evaluate chronic impacts of metsulfuron methyl to nontarget organisms.

102 Conclusion

EEB has completed a review of Dupont's proposed EUP to test Escort for use in forestry for site preparation and conifer release and concludes that the proposed EUP does not pose a significant hazard to nontarget fish or wildlife species. However, the endangered plant species identified under 101.2 Endangered Species Considerations will be at risk. To address this risk, EEB is requiring the counties containing these species be excluded from the EUP test area. Notice that this requirement also includes the initial use, noncropland. Since test sites are established, EEB is requiring, in these cases, Endangered Species Specialist for each respective Region of the U.S. Department of Interior be consulted.

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Date: 10-16-85

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