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SHAUGHNESSEY NO

REVIEW NO.

EEB REVIEW

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PETITION OR EXP. NO. _____

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TYPE PRODUCT(S) Herbicide

DATA ACCESSION NO(S) _____

PRODUCT MANAGER, NO. R. Taylor (25)

PRODUCT NAME(S) Amber

COMPANY NAME Ciba-Geigy Corp.

SUBMISSION PURPOSE Proposed Registration of Pre-emergent
use on wheat and post-emergent use on
fallow croplands

SHAUGHNESSEY NO. CHEMICAL % A.I.

128969-3 Triasulfuron _____



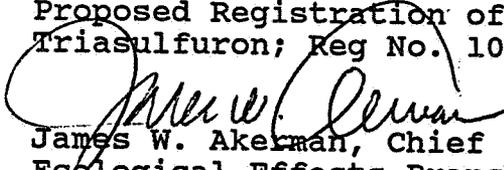
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

October 3, 1989

SUBJECT: Proposed Registration of New Uses for
Triasulfuron; Reg No. 100-TNR

FROM: 
James W. Akerman, Chief
Ecological Effects Branch
Environmental Fate and Effects Division H7507C

TO: Robert Taylor PM-25
Herbicide/Fungicide Branch
Registration Division H7505C

Introduction

The registrant of Triasulfuron, Ciba Geigy, has requested to add pre-emergence use on wheat and post-emergent use on fallow croplands.

Background

The EEB prepared the "Registration Standard for a New Pesticide" for Triasulfuron June 27, 1989. At that time, we concluded that the use of triasulfuron on wheat, barley, turf and noncrop areas at around 0.05 lb. ai/acre would result in minimal impact to terrestrial and aquatic organisms. However, we also concluded that it was likely to impact nontarget terrestrial and aquatic plant species. Field testing with plants was required. We also concluded that endangered plant species may be affected and would be addressed under the endangered species program.

In addition to the field testing for plants mentioned above, the EEB also indicated that other additional data were needed;

A. The acute shrimp test submitted was categorized as supplemental and must be repeated because a NOEL was not obtained. It does not fulfill the guideline requirements;

B. The raw data for the Quahog clam study must be provided. The study, as submitted, is invalid and does not fulfill the guideline requirements;

C. The growth (length/weight) data sheets for the freshwater fish early life stage study must be resubmitted, the ones provided were not legible. The study was categorized as supplemental and does not fulfill the guideline requirements;

D. An acute contact LD50 study with honey bees (141-1) is required.

E. Results from EFGWB terrestrial and aquatic field dissipation studies; and

F. Results from a fish bioaccumulation study (72-6).

Discussion

The registrant proposes to add pre-emergence use on wheat and post-emergence use on fallow croplands to the proposed use of Amber on wheat and barley. Apparently the use rate would be the same, as no additional use information was provided.

The primary concern is the extreme toxicity of this herbicide to nontarget terrestrial and aquatic plants. Tier III phytotoxicity testing has been requested to determine if triasulfuron is likely to move off the treatment site and impact adjacent habitat. Also important in assessing hazard to plants is the environmental fate information listed above. Based on available information, EEB considers it highly likely that triasulfuron will transport from treatment sites and adversely impact nontarget terrestrial and aquatic plants. Because of its persistence, solubility and toxicity to aquatic plants, effects to aquatic plants and ecosystems are expected to be severe.

The required data and field testing have not been submitted. The EEB considers that the receipt of the required data is essential before completing a risk assessment for all triasulfuron uses including those proposed in this submission.

Conclusion

The EEB concluded in the previously prepared new chemical registration standard for triasulfuron that its use is likely to severely impact nontarget terrestrial and aquatic plants. We still consider this likely and do not concur with registering uses of triasulfuron.

The EEB has required certain additional data. These data are essential before we can conclude safety from the use of triasulfuron on wheat, barley and fallow croplands.

If you have questions, please contact Dan Rieder.