

US EPA ARCHIVE DOCUMENT

4-29-94

DP Barcode : D198525  
PC Code No : 128997  
EEB Out :

To: Susan Lewis/Benjamin Chambliss  
Product Manager  
Registration Division 7505C

From: Anthony F. Maciorowski, Chief  
Ecological Effects Branch/EFED 7507C

Attached, please find the EEB review of...

Reg./File # : \_\_\_\_\_  
Chemical Name : Tebuconazole  
Type Product : Fungicide  
Product Name : Folicur  
Company Name : Miles INC.  
Purpose : Review of use on peanuts

Action Code : 101 Date Due : 5/24/94  
Reviewer : Conchi Rodríguez Date In EEB: 2/9/94

EEB Guideline/MRID Summary Table: The review in this package contains an evaluation of the following:

| GDLN NO | MRID NO | CAT | GDLN NO | MRID NO | CAT | GDLN NO  | MRID NO | CAT |
|---------|---------|-----|---------|---------|-----|----------|---------|-----|
| 71-1(A) |         |     | 72-2(A) |         |     | 72-7(A)  |         |     |
| 71-1(B) |         |     | 72-2(B) |         |     | 72-7(B)  |         |     |
| 71-2(A) |         |     | 72-3(A) |         |     | 122-1(A) |         |     |
| 71-2(B) |         |     | 72-3(B) |         |     | 122-1(B) |         |     |
| 71-3    |         |     | 72-3(C) |         |     | 122-2    |         |     |
| 71-4(A) |         |     | 72-3(D) |         |     | 123-1(A) |         |     |
| 71-4(B) |         |     | 72-3(E) |         |     | 123-1(B) |         |     |
| 71-5(A) |         |     | 72-3(F) |         |     | 123-2    |         |     |
| 71-5(B) |         |     | 72-4(A) |         |     | 124-1    |         |     |
| 72-1(A) |         |     | 72-4(B) |         |     | 124-2    |         |     |
| 72-1(B) |         |     | 72-5    |         |     | 141-1    |         |     |
| 72-1(C) |         |     | 72-6    |         |     | 141-2    |         |     |
| 72-1(D) |         |     |         |         |     | 141-5    |         |     |

Y=Acceptable (Study satisfied Guideline)/Concur  
P=Partial (Study partially fulfilled Guideline but additional information is needed)  
S=Supplemental (Study provided useful information but Guideline was not satisfied)  
N=Unacceptable (Study was rejected)/Nonconcur

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HO

DP BARCODE: D198525

CASE: 192685  
SUBMISSION: S456847

DATA PACKAGE RECORD  
BEAN SHEET

DATE: 01/24/94  
Page 1 of 1

\* \* \* CASE/SUBMISSION INFORMATION \* \* \*

CASE TYPE: REGISTRATION      ACTION: 101      RESB NC-FOOD/FEED USE  
RANKING : 35 POINTS (KO)  
CHEMICALS: 128997 Tebuconazole      38.7000%

ID#: 003125-GOU FOLICUR 3.6 F  
COMPANY: 003125 MILES INC  
PRODUCT MANAGER: 21 SUSAN LEWIS      703-305-5200      ROOM: CM2      217  
PM TEAM REVIEWER: BENJAMIN CHAMBLISS      703-305-7382      ROOM: CM2      233  
RECEIVED DATE: 12/09/93      DUE OUT DATE: 06/17/94

\* \* \* DATA PACKAGE INFORMATION \* \* \*

DP BARCODE: 198525      EXPEDITE: N      DATE SENT: 01/24/94      DATE RET.: / /  
CHEMICAL: 128997 Tebuconazole  
DP TYPE: 001 Submission Related Data Package  
CSF: N      LABEL: Y

|             |          |          |                          |
|-------------|----------|----------|--------------------------|
| ASSIGNED TO | DATE IN  | DATE OUT | ADMIN DUE DATE: 05/24/94 |
| DIV : EFED  | 02/08/94 | / /      | NEGOT DATE: / /          |
| BRAN: EEB   | 02/09/94 | / /      | PROJ DATE: / /           |
| SECT:       | / /      | / /      |                          |
| REVR :      | 2/9/94   | / /      |                          |
| CONTR:      | / /      | / /      |                          |

\* \* \* DATA REVIEW INSTRUCTIONS \* \* \*

Please review this revised labeling. These changes were discussed in a Dec.93 meeting as risk mitigation measures to address EEB concerns. Priority Points= 35 [K,O]

\* \* \* DATA PACKAGE EVALUATION \* \* \*

No evaluation is written for this data package

\* \* \* ADDITIONAL DATA PACKAGES FOR THIS SUBMISSION \* \* \*

|       |                |          |          |     |     |       |
|-------|----------------|----------|----------|-----|-----|-------|
| DP BC | BRANCH/SECTION | DATE OUT | DUE BACK | INS | CSF | LABEL |
|-------|----------------|----------|----------|-----|-----|-------|

101

ECOLOGICAL EFFECTS BRANCH REVIEW

TEBUCONAZOLE (FOLICUR 3.6 F, FOLIAR FUNGICIDE)

100 Submission Purpose and Label Information

Pesticide Use

Miles Corporation is requesting registration of a new use for tebuconazole. This chemical will be used on peanuts for control of scletorium stem rot (white mold), rhizoctonia limb rot, early and late leafspot and leaf rust.

100.2 Formulation Information

Active Ingredient:

Tebuconazole, a-[2-(-Chlorophenyl)-ethyl]-a-(1,1-dimethylethyl)-1H-1,2,4-triazole-1-ethanol.....38.7%

Inert Ingredients.....61.3%

100.3 Application Methods, Directions, Rates

Folicur 3.6 F can be applied at a rate of 7.2 fluid ounces per acre (0.2025 lb a.i./acre) as a foliar spray. It is not to be applied through any type of irrigation system. A maximum of 28.8 fluid ounces per acre (0.81 lb a.i./acre) may be applied per harvest cycle. The first application is done before the disease becomes established and four consecutive applications must be made at 14 days intervals. Folicur 3.6 F may be applied up to the day of harvest.

100.4 Target Organisms

Scletorium stem rot (white mold), rhizoctonia limb rot, early and late leafspot and leaf rust.

100.5 Precautionary Labeling

The label should read as follows:

This pesticide is toxic to estuarine and marine invertebrates. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high-water mark. Runoff may be hazardous to aquatic organisms in neighboring areas. Do not contaminate water when disposing of equipment washwater or rinsate.

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Hazard Assessment

Tebuconazole is a broad spectrum, systemic fungicide. It is stable in sterile water at 25 C and pH of 5, 7, and 9. Photodegradation in water takes place with half-life of approximately 600 days. The half-life in sandy loam soils under aerobic and anaerobic conditions is 610 and 400 days, respectively. Photodegradation in soil is more rapid with a half-life of 191 days. There is little potential for leaching.

## 101.1

Discussion

The data requirements for the registration of this manufacturing use product were submitted by Miles Inc.. A summary of the studies is presented here.

| Guide. Ref. No. | Test Species               | % a.i. | Test Type          | Test Results                              | Study Status | MRID No.  |
|-----------------|----------------------------|--------|--------------------|-------------------------------------------|--------------|-----------|
| 71-1 (a)        | <u>Colinus virginianus</u> | 94.7   | Avian Single Dose  | LD50 = 1988 mg/kg                         | Core         | 407009-05 |
| 71-2 (a)        | <u>Colinus virginianus</u> | 96.28  | Acute Oral         | LC50 = >5000 ppm                          | Core         | 407009-08 |
| 71-2 (b)        | <u>Anas platyrhynchos</u>  | 96.28  | Acute Oral         | LC50 = >4816 ppm                          | Core         | 407009-07 |
| 71-4 (a)        | <u>Colinus virginianus</u> | 97     | Avian Reproduction | NOEC = 156 ppm <sup>1</sup>               | Core         | 416242-01 |
| 71-4 (a)        | <u>Colinus virginianus</u> | 97.4   | Avian Reproduction | NOEC = 73.5 ppm <sup>2</sup>              | Core         | 407009-10 |
| 71-4 (b)        | <u>Anas platyrhynchos</u>  | 97.4   | Avian Reproduction | NOEC <sub>2</sub> = 75.8 ppm <sup>2</sup> | Core         | 407009-09 |
| 71-4 (b)        | <u>Anas platyrhynchos</u>  | 96.9   | Avian Reproduction | NOEC = 320 ppm <sup>3</sup>               | Supp.        | 418183-01 |
| 72-1 (a)        | <u>Lepomis macrochirus</u> | 96.28  | Acute Toxicity     | LC50 = 5.7 ppm                            | Core         | 407009-12 |
| 72-1 (c)        | <u>Salmo gairdneri</u>     | 96.28  | Acute Toxicity     | LC50 = 4.4 ppm                            | Core         | 407009-11 |
| 72-2 (a)        | <u>Daphnia magna</u>       | 96.28  | Acute Toxicity     | EC50 = 4.0 ppm                            | Core         | 407009-13 |

|             |                              |       |                       |                                |      |           |
|-------------|------------------------------|-------|-----------------------|--------------------------------|------|-----------|
| 72-3<br>(a) | <u>Cyprinodon variegatus</u> | 96.28 | Acute Toxicity        | LC50 =<br>5.9 ppm              | Core | 409959-04 |
| 73-3<br>(b) | <u>Crassostrea virginica</u> | 96.28 | Shell Deposition      | EC50 =<br>2.7 ppm              | Core | 409959-03 |
| 73-3<br>(c) | <u>Mysidopsis bahia</u>      | 96.28 | Acute Toxicity        | LC50 =<br>0.49<br>ppm          | Core | 409959-02 |
| 72-4<br>(a) | <u>Salmo gairdneri</u>       | 96.3  | Fish Early Life Stage | MATC<br>0.012-<br>0.025<br>ppm | Core | 407009-14 |
| 72-4<br>(a) | <u>Cyprinodon variegatus</u> | 97.5  | Fish Early Life Stage | MATC<br>0.022-<br>0.048<br>ppm | Core | 420382-02 |
| 72-4<br>(b) | <u>Daphnia magna</u>         | 96.28 | Life Cycle            | MATC<br>0.12-<br>0.23<br>ppm   | Core | 407009-15 |
| 72-4<br>(b) | <u>Mysidopsis bahia</u>      | 97.5  | Life Cycle            | MATC<br>0.035-<br>0.061<br>ppm | Core | 420382-01 |

1. Based on treatment related lesions observed during necropsy.
2. Highest level tested. No effects were observed.
3. Based on number of hatchlings per hen.

## 101.2 Likelihood of Adverse Effects to Non-target Organisms

### Terrestrial Organisms

#### Birds

The data submitted by the registrant showed that Tebuconazole is slightly toxic to bobwhite quail (LD50 = 1988 mg/kg) on an oral basis. It also shows that Tebuconazole is practically non-toxic to the bobwhite quail (LC50 >5000 ppm) and to the mallard duck (LC50 >4816 ppm) in dietary studies.

On an acute basis the residues found on short grass after a single application of 0.2025 lbs ai/acre and the maximum seasonal application rate of 0.81 lb ai/acre represent little risk to birds (See Appendix 1 for residues on different food items). The levels of concern (LOC) for birds are not exceeded (Table 1).

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Table 1. Acute Avian Risk Quotients and LOC for the a single and maximum seasonal application of tebuconazole to peanuts (LC50 > 4816 ppm)

| Use Site | Application Rate                  | Substrate (EEC)         | Risk Quotient (EEC/LC50) | LOC                                     |
|----------|-----------------------------------|-------------------------|--------------------------|-----------------------------------------|
| Peanuts  | 0.225 lbs ai (single application) | Short Grass (48.6 ppm)  | 0.01                     | HR ≥ 0.5<br>RU ≥ 0.2<br>ES ≥ 0.1        |
| Peanuts  | 0.81 lb ai (seasonal application) | Short Grass (194.4 ppm) | 0.04                     | High Risk ≥ 0.5<br>RU ≥ 0.2<br>ES ≥ 0.1 |

HR = High Risk, RU = Restricted Use, ES = Endangered Species

An avian reproduction study indicate that the NOEC and LOEC for the mallard duck are 320 and 611 ppm respectively. The affected parameter was the number of hatchling per pen. An avian reproduction study for the bobwhite quail indicate that the NOEC and LOEC are 156 and 320 ppm respectively. The NOEC value was based on treatment related lesions observed in necropsy. After 4 applications of tebuconazole, the estimated average residue and the estimated maximum residue in short grass are 112.9 ppm and 180.4 ppm (Appendix 2). The maximum residue is higher than the NOEC for the quail. The level of concern is triggered for this scenarios. However, since vegetation in the field is minimal (peanut vines) and no drift is expected to adjacent short grass (ground application only), exposure to birds will be primarily insects or peanut foliage. The maximum residue expected to be found on insects or forage occurs at the fourth application and is 43.4 ppm (Appendix 3). The risk quotient does not exceeds the level of concern, therefore there is small risk to birds (Table 2).

Table 2. Chronic Avian Risk Quotients and LOC for average and maximum residues on short grass for a period of 55 days when four applications of tebuconazole at a rate 0.2025 lb ai/acre were done. (NOEL = 156 ppm bobwhite quail)

| Use Site | Residue During a 55 Day Period            | Substrate (EEC)           | Risk Quotient (EEC/NOEL) | LOC           |
|----------|-------------------------------------------|---------------------------|--------------------------|---------------|
| Peanuts  | Average Residue (for 55 days)             | Short Grass (112.9 ppm)   | 0.72                     | High Risk ≥ 1 |
|          |                                           | Insects/Forage (27.1 ppm) | 0.17                     |               |
| Peanuts  | Maximum Residue (during the last 13 days) | Short Grass (180.4 ppm)   | 1.15                     | High Risk ≥ 1 |
|          |                                           | Insects/Forage (43.3 ppm) | 0.27                     |               |

HR = High Risk

### Small Mammals

An acute rat study indicated that the LD50 is 3933 mg/kg. EEB estimates an LC50 value from the LD50, body weight and food consumption (See Appendix 4 for formula). A representative of a herbivore (meadow vole LC50 = 6238 ppm), a granivore (deer mouse LC50 = 24347 ppm) and of an insectivore (least shrew LC50 = 3575 ppm) were used to estimate the risk to small mammals. The risk quotients were estimated for a single application of tebuconazole and for the maximum seasonal application. The risk quotients did not exceed the levels of concern (Table 3), therefore there is a minimal risk to mammals.

Table 3. Risk Quotients, LOC, Expected foods, EEC (estimated environmental concentration) and LC50 for three small mammals representing different food preferences. See Appendix 2 for EEC calculations.

| Use Sites | Application Rate                        | Species (LC50)          | Expected Food (EEC ppm) | Risk Quotient | LOC                              |
|-----------|-----------------------------------------|-------------------------|-------------------------|---------------|----------------------------------|
| Peanuts   | 0.2025 lb ai/acre (single application)  | Meadow Vole (6438 ppm)  | Grasses (48.6)          | 0.007         | HR ≥ 0.5<br>RU ≥ 0.2<br>ES ≥ 0.1 |
|           |                                         | Least Shrew (3575 ppm)  | Insects (11.7)          | 0.003         |                                  |
|           |                                         | Deer Mouse (24,347 ppm) | Seeds (2.4)             | 0.00009       |                                  |
| Peanuts   | 0.81 lbs ai/acre (seasonal application) | Meadow Vole (6438 ppm)  | Grasses (191.4)         | 0.02          | HR ≥ 0.5<br>RU ≥ 0.2<br>ES ≥ 0.1 |
|           |                                         | Least Shrew (3575 ppm)  | Insects (47)            | 0.01          |                                  |
|           |                                         | Deer Mouse (24,347 ppm) | Seeds (9.7)             | 0.0003        |                                  |

HR = High Risk, RU = Restricted Use, ES = Endangered Species

### Aquatic Organisms

#### Freshwater

The data submitted by the registrant showed that Tebuconazole is moderately toxic to the bluegill sunfish (LC50 = 5.7 ppm), to the rainbow trout (LC50 = 4.4 ppm) and to water flea (Daphnia magna) (LC50 = 4.0 ppm) on an acute basis.



The results of a screening model to calculated the EEC, predicted a concentration of 1.2 ppb. This model takes into consideration the KOC, aerobic soil metabolism rate and spray drift. The EEC is based on one application of 0.2025 lb ai/A assuming 5% runoff two days after application to 6 feet deep pond (Appendix 5). No effects are expected for freshwater aquatic organisms on an acute basis. The levels of concern are not triggered for this scenario (Table 4).

Table 4. Acute Aquatic Organisms Risk Quotients and LOC for a single and maximum seasonal application of tebuconazole to peanuts two days after application. (LC50 = 4.0 ppm Daphnia)

| Use Site | Application Rate                        | EEC<br>6 ft Pond | Risk<br>Quotient<br>(EEC/LC50) | LOC                                             |
|----------|-----------------------------------------|------------------|--------------------------------|-------------------------------------------------|
| Peanuts  | 0.225 lbs ai<br>(single<br>application) | 0.0012 ppm       | 0.0003                         | HR $\geq$ 0.5<br>RU $\geq$ 0.2<br>ES $\geq$ 0.1 |
| Peanuts  | 0.81 lb ai<br>(seasonal<br>application) | 0.0048 ppm       | 0.0012                         | HR $\geq$ 0.5<br>RU $\geq$ 0.2<br>ES $\geq$ 0.1 |

HR = High Risk, RU = Restricted Use, ES = Endangered Species

Chronic studies show that the NOEC and LOEC for rainbow trout are 0.012-0.025 ppm respectively. The affected parameter for the trout was larval survival. The NOEC and LOEC for the sheepshead minnow are 0.022-0.048 ppm respectively. The affected parameter was reproductive success. Chronic studies for aquatic invertebrates showed that the NOEC and LOEC for the water flea (Daphnia magna) are 0.12-0.23 ppm respectively. The affected parameters were adult length and number of young produced. The rainbow trout seems to be the most sensitive aquatic organism.

The major concern is with repeat applications. Given that environmental fate studies show no degradation after 28 days in waters ranging from pH 5 to 9, residues could rise to levels that would adversely affect freshwater species. Since this chemical will be applied on alternate years in areas close to aquatic systems and because of the long half life, the EEC was calculated for the following time periods: (1) the first season when tebuconazole will be applied (first year), (2) end of second year when no application is to be made, and (3) the second season (third year).

For the first season, the average residues and maximum residues (Appendix 6) found at the end of the season, does not pose a chronic risk to aquatic organisms. The level of concern is not exceeded (Table 5).

Table 5. Aquatic Chronic Risk Quotients and LOC for average and maximum residues expected to be found in 6 feet deep pond during a period of 55 days when four applications of tebuconazole at a rate 0.2025 lb ai/acre were done (NOEL = 0.012 ppm Rainbow Trout)

| Use Site | Residue During a 55 Day Period            | EEC 6 ft Pond | Risk Quotient (EEC/NOEL) | LOC                |
|----------|-------------------------------------------|---------------|--------------------------|--------------------|
| Peanuts  | Average Residue (for 55 days)             | 0.0029 ppm    | 0.24                     | High Risk $\geq 1$ |
| Peanuts  | Maximum Residue (during the last 13 days) | 0.0046 ppm    | 0.38                     | High Risk $\geq 1$ |

The residue found at the end of the second year (day 720) is 0.0020 ppm (Appendix 7). At the end of the second year no effects are expected for aquatic organisms. The Risk Quotient is 0.16.

At the beginning of the next season (third year), the residue is 0.0020 ppm (from the first year). A residue of 0.0012 ppm is added as a result of the first application (Appendix 8). At the fourth application the residue in water exceed the NOEL for the rainbow trout (12 ppb). This residue is expected to be present for over two weeks. Chronic effects for fish are expected as a result of the use tebuconazole at the time of the fourth application. The levels of concern are triggered for the maximum residue, therefore there is a risk for fish (Table 6).

Table 6. Third year Aquatic Chronic Risk Quotients and LOC for average and maximum residues expected to be found in 6 feet deep pond during a period of 55 days when four applications of tebuconazole at a rate 0.2025 lb ai/acre were done (NOEC = 0.012 ppm rainbow trout)

| Use Site | Residue During a 55 Day Period            | EEC 6 ft Pond | Risk Quotient (EEC/NOEC) | LOC                |
|----------|-------------------------------------------|---------------|--------------------------|--------------------|
| Peanuts  | Average Residue (for 55 days)             | 0.0078 ppm    | 0.65                     | High Risk $\geq 1$ |
| Peanuts  | Maximum Residue (during the last 13 days) | 0.0125 ppm    | 1.04                     | High Risk $\geq 1$ |

#### Estuarine/Marine Organisms

Tebuconazole is moderately toxic to estuarine organisms with an LC50 of 5.9 ppm for sheepshead minnow, 2.7 ppm

for eastern oyster. It is highly toxic to mysid shrimp (Mysidopsis bahia) with an LC50 of 0.49 ppm. The levels of concern were not triggered (Table 7) therefore, no acute risk is expected from the use of tebuconazole.

Table 7. Acute Estuarine/Marine Organisms Risk Quotients and LOC for a single and maximum seasonal application of tebuconazole to peanuts (LC50 = 0.49 ppm)

| Use Site | Application Rate                        | EEC<br>6 ft Pond | Risk<br>Quotient<br>(EEC/LC50) | LOC                              |
|----------|-----------------------------------------|------------------|--------------------------------|----------------------------------|
| Peanuts  | 0.225 lbs ai<br>(single<br>application) | 0.0012 ppm       | 0.002                          | HR ≥ 0.5<br>RU ≥ 0.2<br>ES ≥ 0.1 |
| Peanuts  | 0.81 lb ai<br>(seasonal<br>application) | 0.0048 ppm       | 0.009                          | HR ≥ 0.5<br>RU ≥ 0.2<br>ES ≥ 0.1 |

HR = High Risk, RU = Restricted Use, ES = Endangered Species

A mysid shrimp (Mysidopsis bahia) life cycle study showed that the NOEC and LOEC were 0.035-0.061 ppm respectively. The affected parameter was reproductive success. No risk is expected for estuarine/marine organisms. The levels of concern are not triggered for the first season (first year) nor for second season (third year) of tebuconazole use (Table 8). Residues were only considered for the third year because they are higher than the previous years.

Table 8. Chronic Estuarine Organisms Risk Quotients and LOC during the third year for average and maximum residues expected to be found in 6 feet deep pond during a period of 55 days when four applications of tebuconazole at a rate 0.2025 lb ai/acre were done. (NOEC = 0.35 ppm mysid shrimp)

| Use Site | Residues During<br>a 55 Day Period              | EEC<br>6 ft Pond | Risk<br>Quotient<br>(EEC/NOEC) | LOC           |
|----------|-------------------------------------------------|------------------|--------------------------------|---------------|
| Peanuts  | Average Residue<br>(for 55 days)                | 0.0078 ppm       | 0.22                           | High Risk ≥ 1 |
| Peanuts  | Maximum Residue<br>(during the<br>last 13 days) | 0.125 ppm        | 0.35                           | High Risk ≥ 1 |

### 101.3 Endangered Species Considerations

A risk to endangered fish is expected on a chronic basis. The following endangered fish have been associated with peanuts fields: gulf sturgeon, shortnose sturgeon, pallid sturgeon, okaloosa dater, bayou darter, leopard darter, waccamaw sturgeon, roanoke logperch. See Appendix 8 for a list of all endangered fish in the states and counties where peanuts is grown. At this time

consultation with the Fish and Wildlife Service would be required unless the counties are restricted in the label.

The risk to endangered species is based on the tier 1 exposure assessment. EEB recommends that a refine exposure assessment be conducted. The results of the exposure assessment might change the risk assessment.

The EEB also recommends limiting the number of applications to three. This will reduce the residue found at the end of the season below our level of concern.

After the above two measures are taken, the EEB will decide if a consultation with the Fish and Wildlife Service is still needed.

101.4

#### Risk Mitigation

The label states several risk mitigation measures. To mitigate for chronic effects for endangered and non endangered fish the following restrictions have to be applied:

1. "Apply only during alternate years to fields adjacent to aquatic areas listed above" (lakes, reservoirs, rivers, permanent streams, marshes or natural ponds, and estuaries)
2. "Do not apply within 100 feet of aquatic areas listed above"
3. "In counties with endangered fish species, do not apply within 150 feet of aquatic areas listed above.. Contact your local agricultural extension agent for a list of counties of concern."
4. "Do not cultivate within 10 feet of an aquatic area to allow growth of a vegetative filter strip."

The EEB is concern with the buffer zones. There are questions on how cultivation cannot be made within 10 feet of an aquatic area and not applying pesticide within 100 feet of an aquatic area. The interpretation of item number 2 is that those areas will be cultivated but no application of pesticide will be done. The interpretation of item number 4 is that 10 of those 100 feet will not be cultivated. Is the 100 feet buffer zone realistic if they are going to cultivate 90 of the 100 feet?

A mitigation measure to reduce the risk to fish is to have three applications instead of four. The level of concern is triggered at the fourth application of tebuconazole. Having three applications will reduce the residue below our level of concern.

The EEB recommend that a refined exposure assessment be conducted. The results of the refined exposure assessment might change the risk assessment.

101.4 Adequacy of Toxicity Data

The data base is complete.

101.5 Adequacy of Labeling

The label should include the following:

1. This pesticide is toxic to estuarine and marine invertebrates. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high-water mark. Runoff may be hazardous to aquatic organisms in neighboring areas. Do not contaminate water when disposing of equipment washwater or rinsate.

2. Aerial application is prohibited.

Conchi Rodríguez  
Biologist  
Ecological Effects Branch

*Conchi Rodríguez* 4/29/94

Harry Craven  
Supervisory Biologist  
Ecological Effects Branch

*Harry Craven*

*fm* Anthony F. Maciorowski  
Chief  
Ecological Effects Branch

*Anthony F. Maciorowski*  
4/29/94

APPENDIX 1

Residue expected to be found on different avian food items  
after application of tebuconazole

| Substrate               | Residues (ppm) |             |
|-------------------------|----------------|-------------|
|                         | 0.2025 lbs ai  | 0.81 lbs ai |
| Short Grass             | 48.6           | 194.4       |
| Long Grass              | 22.3           | 89.1        |
| Leaves and Leafy Crops  | 25.3           | 101.3       |
| Forage, alfalfa, clover | 11.7           | 47          |
| Pod Containing Seeds    | 2.4            | 9.7         |
| Fruit                   | 1.4            | 5.7         |

APPENDIX 2

DAILY ACCUMULATED PESTICIDE RESIDUES---MULTP. APPL:

Chemical name ----- Tebuconazole  
 Initial concentration (ppm) ----- 49 (short grass)  
 Half-life ----- 191 (photodegradation)  
 A number of application ----- 5  
 Application interval ----- 14  
 Length of simulation (day) ----- 60

DAY RESIDUE (PPM)

|             |                 |
|-------------|-----------------|
| 0,49        | 38,134.8544     |
| 1,48.8225   | 39,134.3659     |
| 2,48.64564  | 40,133.8792     |
| 3,48.46943  | 41,133.3942     |
| 4,48.29385  | 42,181.911      |
| 5,48.11891  | 43,181.252      |
| 6,47.94459  | 44,180.5954     |
| 7,47.77092  | 45,179.9412     |
| 8,47.59787  | 46,179.2894     |
| 9,47.42544  | 47,178.6399     |
| 10,47.25365 | 48,177.9928     |
| 11,47.08248 | 49,177.3481     |
| 12,46.91192 | 50,176.7056     |
| 13,46.74198 | 51,176.0655     |
| 14,95.57266 | 52,175.4277     |
| 15,95.22646 | 53,174.7922     |
| 16,94.8815  | 54,174.1591     |
| 17,94.53779 | 55,173.5282     |
| 18,94.19534 | 56,221.8996     |
| 19,93.85411 | 57,221.0957     |
| 20,93.51413 | 58,220.2948     |
| 21,93.17539 | 59,219.4968     |
| 22,92.83786 | 60,218.7017     |
| 23,92.50155 | Maximum residue |
| 24,92.16647 | ----- 221.8996  |
| 25,91.83259 | Average residue |
| 26,91.49994 | ----- 122.598   |
| 27,91.16849 |                 |
| 28,139.8382 |                 |
| 29,139.3317 |                 |
| 30,138.827  |                 |
| 31,138.3241 |                 |
| 32,137.823  |                 |
| 33,137.3237 |                 |
| 34,136.8263 |                 |
| 35,136.3306 |                 |
| 36,135.8368 |                 |
| 37,135.3447 |                 |

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APPENDIX 3

DAILY ACCUMULATED PESTICIDE RESIDUES---MULTP. APPL.

|                                   |                        |
|-----------------------------------|------------------------|
| Chemical name -----               | Tebuconazole           |
| Initial concentration (ppm) ----- | 11.7 (insects/forage)  |
| Half-life -----                   | 191 (photodegradation) |
| A number of application -----     | 4                      |
| Application interval -----        | 14                     |
| Length of simulation (day) -----  | 55                     |

DAY RESIDUE (PPM)

|             |                          |
|-------------|--------------------------|
|             | 37,32.317                |
| 0,11.7      | 38,32.19993              |
| 1,11.65762  | 39,32.08329              |
| 2,11.61539  | 40,31.96707              |
| 3,11.57331  | 41,31.85127              |
| 4,11.53139  | 42,43.43589              |
| 5,11.48962  | 43,43.27854              |
| 6,11.44799  | 44,43.12177              |
| 7,11.40653  | 45,42.96556              |
| 8,11.36521  | 46,42.80992              |
| 9,11.32403  | 47,42.65484              |
| 10,11.28301 | 48,42.50033              |
| 11,11.24214 | 49,42.34637              |
| 12,11.20142 | 50,42.19297              |
| 13,11.16084 | 51,42.04013              |
| 14,22.82041 | 52,41.88784              |
| 15,22.73774 | 53,41.7361               |
| 16,22.65538 | 54,41.58492              |
| 17,22.57331 | 55,41.43427              |
| 18,22.49154 | Maximum residue 43.43589 |
| 19,22.41007 | Average residue 27.19053 |
| 20,22.32889 |                          |
| 21,22.248   |                          |
| 22,22.16741 |                          |
| 23,22.08711 |                          |
| 24,22.0071  |                          |
| 25,21.92738 |                          |
| 26,21.84794 |                          |
| 27,21.7688  |                          |
| 28,33.38995 |                          |
| 29,33.26899 |                          |
| 30,33.14847 |                          |
| 31,33.02839 |                          |
| 32,32.90875 |                          |
| 33,32.78954 |                          |
| 34,32.67076 |                          |
| 35,32.55242 |                          |
| 36,32.4345  |                          |

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APPENDIX 4

Formula for the calculation of the small mammals LC50 derived from the rat LD50

LD50 rat (female) = 3933 mg/kg (TOX One Liner)

| Species     | Body Weight <sup>1</sup> | Food Consumption <sup>1</sup> | Expected Food |
|-------------|--------------------------|-------------------------------|---------------|
| Meadow Vole | 46 g                     | 28.1 g                        | grasses       |
| Deer Mouse  | 13 g                     | 2.1 g                         | seeds         |
| Least Shrew | 5 g                      | 5.5 g                         | insects       |

$$LC50 = LD50 \times \text{body weight} \div \text{daily food consumption}$$

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<sup>1</sup>From Davis, D. and F. Golly, 1963. Principles of Mammology. Reinhold Publ. Corp., NY

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APPENDIX 5

RUN No. 1 FOR Tebuconazole INPUT VALUES

| APPLICATION RATE (LBS/ACRE) | HALF-LIFE (DAYS) | DAYS TO RUNOFF | SOIL KOC |
|-----------------------------|------------------|----------------|----------|
| .810                        | 610.0            | 2.0            | 1065.0   |

THE PRELIMINARY EEC VALUE IS 4.9 PPB

RUN No. 2 FOR Tebuconazole INPUT VALUES

| APPLICATION RATE (LBS/ACRE) | HALF-LIFE (DAYS) | DAYS TO RUNOFF | SOIL KOC |
|-----------------------------|------------------|----------------|----------|
| .203                        | 610.0            | 2.0            | 1065.0   |

THE PRELIMINARY EEC VALUE IS 1.2 PPB

APPENDIX 6

DAILY ACCUMULATED PESTICIDE RESIDUES---MULTP. APPL.

|                                   |                               |
|-----------------------------------|-------------------------------|
| Chemical name -----               | Tebuconazole                  |
| Initial concentration (ppb) ----- | 1.2 (residue in water)        |
| Half-life -----                   | 610 (aerobic soil metabolism) |
| A number of application -----     | 4                             |
| Application interval -----        | 14                            |
| Length of simulation (day) -----  | 55                            |

DAY RESIDUE (PPB)

|              |                          |
|--------------|--------------------------|
| 0, 1.2       | 37, 3.507429             |
| 1, 1.198637  | 38, 3.503445             |
| 2, 1.197276  | 39, 3.499467             |
| 3, 1.195916  | 40, 3.495493             |
| 4, 1.194558  | 41, 3.491523             |
| 5, 1.193202  | 42, 4.687557             |
| 6, 1.191846  | 43, 4.682234             |
| 7, 1.190493  | 44, 4.676917             |
| 8, 1.189141  | 45, 4.671605             |
| 9, 1.187791  | 46, 4.6663               |
| 10, 1.186442 | 47, 4.661001             |
| 11, 1.185094 | 48, 4.655707             |
| 12, 1.183748 | 49, 4.65042              |
| 13, 1.182404 | 50, 4.645139             |
| 14, 2.381061 | 51, 4.639864             |
| 15, 2.378357 | 52, 4.634594             |
| 16, 2.375656 | 53, 4.629331             |
| 17, 2.372958 | 54, 4.624074             |
| 18, 2.370263 | 55, 4.618822             |
| 19, 2.367571 | Maximum residue 4.687557 |
| 20, 2.364883 | Average residue 2.931326 |
| 21, 2.362197 |                          |
| 22, 2.359514 |                          |
| 23, 2.356835 |                          |
| 24, 2.354158 |                          |
| 25, 2.351485 |                          |
| 26, 2.348814 |                          |
| 27, 2.346147 |                          |
| 28, 3.543482 |                          |
| 29, 3.539458 |                          |
| 30, 3.535439 |                          |
| 31, 3.531423 |                          |
| 32, 3.527413 |                          |
| 33, 3.523407 |                          |
| 34, 3.519405 |                          |
| 35, 3.515409 |                          |
| 36, 3.511417 |                          |

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APPENDIX 7

RESIDUES FOUND AT THE END OF THE SECOND YEAR

DAILY PESTICIDE RESIDUE--SINGLE APPLICATION

|                                   |                                                  |
|-----------------------------------|--------------------------------------------------|
| Chemical name -----               | Tebuconazole                                     |
| Initial concentration (ppb) ----- | 4.68 (residue at the time of fourth application) |
| Half-life -----                   | 610 (aerobic soil metabolism)                    |
| Length of simulation (day) -----  | 720                                              |

DAY RESIDUE (PPB)

|             |                          |
|-------------|--------------------------|
|             | 37,4.487316              |
| 0,4.68      | 38,4.48222               |
| 1,4.674685  | 39,4.47713               |
| 2,4.669376  | 40,4.472045              |
| 3,4.664073  | 41,4.466967              |
| 4,4.658777  | 42,4.461893              |
| 5,4.653486  | 691,2.134239             |
| 6,4.648201  | 692,2.131815             |
| 7,4.642922  | 693,2.129394             |
| 8,4.637649  | 694,2.126976             |
| 9,4.632383  | 695,2.12456              |
| 10,4.627122 | 696,2.122147             |
| 11,4.621867 | 697,2.119738             |
| 12,4.616618 | 698,2.11733              |
| 13,4.611375 | 699,2.114926             |
| 14,4.606138 | 700,2.112524             |
| 15,4.600907 | 701,2.110124             |
| 16,4.595682 | 702,2.107728             |
| 17,4.590463 | 703,2.105335             |
| 18,4.58525  | 704,2.102943             |
| 19,4.580042 | 705,2.100555             |
| 20,4.574841 | 706,2.09817              |
| 21,4.569646 | 707,2.095787             |
| 22,4.564456 | 708,2.093407             |
| 23,4.559273 | 709,2.091029             |
| 24,4.554095 | 710,2.088655             |
| 25,4.548923 | 711,2.086283             |
| 26,4.543757 | 712,2.083913             |
| 27,4.538596 | 713,2.081547             |
| 28,4.533442 | 714,2.079183             |
| 29,4.528294 | 715,2.076822             |
| 30,4.523151 | 716,2.074463             |
| 31,4.518015 | 717,2.072107             |
| 32,4.512883 | 718,2.069754             |
| 33,4.507758 | 719,2.067403             |
| 34,4.502639 | 720,2.065055             |
| 35,4.497525 | Maximum residue 4.68     |
| 36,4.492418 | Average residue 3.196448 |

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APPENDIX 8

DAILY ACCUMULATED PESTICIDE RESIDUES---MULTP. APPL.

|                                   |                               |
|-----------------------------------|-------------------------------|
| Chemical name -----               | Tebuconazole                  |
| Initial concentration (ppb) ----- | 3.2 <sup>1</sup>              |
| Half-life -----                   | 610 (aerobic soil metabolism) |
| A number of application -----     | 4                             |
| Application interval -----        | 14                            |
| Length of simulation (day) -----  | 55                            |

DAY RESIDUE (PPB)

|                    |                          |
|--------------------|--------------------------|
|                    | 34,9.385081              |
| 0 3.2 <sup>1</sup> | 35,9.374423              |
| 1,3.196366         | 36,9.363776              |
| 2,3.192736         | 37,9.353142              |
| 3,3.18911          | 38,9.342521              |
| 4,3.185488         | 39,9.33191               |
| 5,3.181871         | 40,9.321313              |
| 6,3.178257         | 41,9.310727              |
| 7,3.174648         | 42,12.50015              |
| 8,3.171042         | 43,12.48596              |
| 9,3.167441         | 44,12.47178              |
| 10,3.163844        | 45,12.45761              |
| 11,3.160251        | 46,12.44347              |
| 12,3.156662        | 47,12.42933              |
| 13,3.153077        | 48,12.41522              |
| 14,6.349497        | 49,12.40112              |
| 15,6.342285        | 50,12.38704              |
| 16,6.335083        | 51,12.37297              |
| 17,6.327889        | 52,12.35892              |
| 18,6.320702        | 53,12.34488              |
| 19,6.313524        | 54,12.33086              |
| 20,6.306354        | 55,12.31686              |
| 21,6.299192        | Maximum residue 12.50015 |
| 22,6.292038        | Average residue 7.816868 |
| 23,6.284892        |                          |
| 24,6.277755        |                          |
| 25,6.270625        |                          |
| 26,6.263504        |                          |
| 27,6.256391        |                          |
| 28,9.449286        |                          |
| 29,9.438555        |                          |
| 30,9.427836        |                          |
| 31,9.417129        |                          |
| 32,9.406433        |                          |
| 33,9.395751        |                          |

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<sup>1</sup>Residue at the end of the second year (Appendix 6) plus residue of the first application of the third year.

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ENDANGERED/THREATENED SPECIES OCCURRING IN  
COUNTIES WHERE PEANUTS  
ARE GROWN

STATE: ARKANSAS

GROUP

STATUS

ACREAGE

COUNTY: CRITTENDEN  
STURGEON, PALLID

FISH

L

1287

ENDANGERED/THREATENED SPECIES OCCURRING IN  
COUNTIES WHERE PEANUTS  
ARE GROWN

| <u>STATE: FLORIDA</u>                                         | <u>GROUP</u> | <u>STATUS</u> | <u>ACREAGE</u> |
|---------------------------------------------------------------|--------------|---------------|----------------|
| <u>COUNTY: CALHOUN</u><br>STURGEON, GULF                      | FISH         | L             | 3495           |
| <u>COUNTY: COLUMBIA</u><br>STURGEON, GULF                     | FISH         | L             | 1688           |
| <u>COUNTY: DIXIE</u><br>STURGEON, GULF                        | FISH         | L             |                |
| <u>COUNTY: ESCAMBIA</u><br>STURGEON, GULF                     | FISH         | L             | 65             |
| <u>COUNTY: GADSDEN</u><br>STURGEON, GULF                      | FISH         | L             | 518            |
| <u>COUNTY: GILCHRIST</u><br>STURGEON, GULF                    | FISH         | L             | 417            |
| <u>COUNTY: HAMILTON</u><br>STURGEON, GULF                     | FISH         | L             | 169            |
| <u>COUNTY: JACKSON</u><br>STURGEON, GULF                      | FISH         | L             | 33836          |
| <u>COUNTY: JEFFERSON</u><br>STURGEON, GULF                    | FISH         | L             | 2052           |
| <u>COUNTY: LAFAYETTE</u><br>STURGEON, GULF                    | FISH         | L             | 73             |
| <u>COUNTY: LEVY</u><br>STURGEON, GULF                         | FISH         | L             | 3158           |
| <u>COUNTY: OKALOOSA</u><br>DARTER, OKALOOSA<br>STURGEON, GULF | FISH<br>FISH | L<br>L        | 900<br>900     |
| <u>COUNTY: SANTA ROSA</u><br>STURGEON, GULF                   | FISH         | L             | 8918           |
| <u>COUNTY: SUWANNEE</u><br>STURGEON, GULF                     | FISH         | L             | 3551           |

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ENDANGERED/THREATENED SPECIES OCCURRING IN  
COUNTIES WHERE PEANUTS  
ARE GROWN

STATE: FLORIDA

GROUP

STATUS

ACREAGE

COUNTY: WAKULLA  
STURGEON, GULF

FISH

L

794

COUNTY: WALTON  
DARTER, OKALOOSA  
STURGEON, GULF

FISH

L

5772

FISH

L

5772

132



ENDANGERED/THREATENED SPECIES OCCURRING IN  
COUNTIES WHERE PEANUTS  
ARE GROWN

| <u>STATE: GEORGIA</u>                            | <u>GROUP</u> | <u>STATUS</u> | <u>ACREAGE</u> |
|--------------------------------------------------|--------------|---------------|----------------|
| <u>COUNTY: APPLING</u><br>STURGEON, SHORTNOSE    | FISH         | L             | 92             |
| <u>COUNTY: BRYAN</u><br>STURGEON, SHORTNOSE      | FISH         | L             | 304            |
| <u>COUNTY: BURKE</u><br>STURGEON, SHORTNOSE      | FISH         | L             | 55             |
| <u>COUNTY: DECATUR</u><br>STURGEON, GULF         | FISH         | L             | 18602          |
| <u>COUNTY: EFFINGHAM</u><br>STURGEON, SHORTNOSE  | FISH         | L             | 384            |
| <u>COUNTY: JEFF DAVIS</u><br>STURGEON, SHORTNOSE | FISH         | L             | 172            |
| <u>COUNTY: MCINTOSH</u><br>STURGEON, SHORTNOSE   | FISH         | L             | 2455           |
| <u>COUNTY: MONTGOMERY</u><br>STURGEON, SHORTNOSE | FISH         | L             | 900            |
| <u>COUNTY: RICHMOND</u><br>STURGEON, SHORTNOSE   | FISH         | L             | 198            |
| <u>COUNTY: SCREVEN</u><br>STURGEON, SHORTNOSE    | FISH         | L             | 7005           |
| <u>COUNTY: SEMINOLE</u><br>STURGEON, GULF        | FISH         | L             | 17433          |
| <u>COUNTY: TATTNALL</u><br>STURGEON, SHORTNOSE   | FISH         | L             | 1303           |
| <u>COUNTY: TELFAIR</u><br>STURGEON, SHORTNOSE    | FISH         | L             | 4834           |
| <u>COUNTY: TOOMBS</u><br>STURGEON, SHORTNOSE     | FISH         | L             | 1574           |
| <u>COUNTY: WHEELER</u><br>STURGEON, SHORTNOSE    | FISH         | L             | 1118           |

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ENDANGERED/THREATENED SPECIES OCCURRING IN  
COUNTIES WHERE PEANUTS  
ARE GROWN

STATE: MISSISSIPPI

COUNTY: COPIAH

DARTER, BAYOU

GROUP

STATUS

ACREAGE

FISH

L

31

COUNTY: HINDS

DARTER, BAYOU

FISH

L

23

STURGEON, GULF

FISH

L

23

COUNTY: JEFFERSON

STURGEON, PALLID

FISH

L

10

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ENDANGERED/THREATENED SPECIES OCCURRING IN  
COUNTIES WHERE PEANUTS  
ARE GROWN

| <u>STATE: SOUTH CAROLINA</u>                     | <u>GROUP</u> | <u>STATUS</u> | <u>ACREAGE</u> |
|--------------------------------------------------|--------------|---------------|----------------|
| <u>COUNTY: ALLENDALE</u><br>STURGEON, SHORTNOSE  | FISH         | L             | 1039           |
| <u>COUNTY: COLLETON</u><br>STURGEON, SHORTNOSE   | FISH         | L             | 21             |
| <u>COUNTY: FLORENCE</u><br>STURGEON, SHORTNOSE   | FISH         | L             | 76             |
| <u>COUNTY: HAMPTON</u><br>STURGEON, SHORTNOSE    | FISH         | L             | 935            |
| <u>COUNTY: ORANGEBURG</u><br>STURGEON, SHORTNOSE | FISH         | L             | 142            |

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**ENDANGERED/THREATENED SPECIES OCCURRING IN  
COUNTIES WHERE PEANUTS  
ARE GROWN**

| <u>STATE: NORTH CAROLINA</u>                      | <u>GROUP</u> | <u>STATUS</u> | <u>ACREAGE</u> |
|---------------------------------------------------|--------------|---------------|----------------|
| <u>COUNTY: BRUNSWICK</u><br>STURGEON, SHORTNOSE   | FISH         | L             | 55             |
| <u>COUNTY: CHOWAN</u><br>STURGEON, SHORTNOSE      | FISH         | L             | 5170           |
| <u>COUNTY: COLUMBUS</u><br>SILVERSIDE, WACCAMAW   | FISH         | L             | 1005           |
| <u>COUNTY: CRAVEN</u><br>STURGEON, SHORTNOSE      | FISH         | L             | 53             |
| <u>COUNTY: MARTIN</u><br>STURGEON, SHORTNOSE      | FISH         | L             | 16286          |
| <u>COUNTY: MOORE</u><br>SHINER, CAPE FEAR         | FISH         | L             | 67             |
| <u>COUNTY: NEW HANOVER</u><br>STURGEON, SHORTNOSE | FISH         | L             | 31             |
| <u>COUNTY: ONSLOW</u><br>STURGEON, SHORTNOSE      | FISH         | L             | 24             |
| <u>COUNTY: PASQUOTANK</u><br>STURGEON, SHORTNOSE  | FISH         | L             | 80             |
| <u>COUNTY: PENDER</u><br>STURGEON, SHORTNOSE      | FISH         | L             | 508            |
| <u>COUNTY: PERQUIMANS</u><br>STURGEON, SHORTNOSE  | FISH         | L             | 2498           |
| <u>COUNTY: RICHMOND</u><br>STURGEON, SHORTNOSE    | FISH         | L             | 85             |
| <u>COUNTY: TYRRELL</u><br>STURGEON, SHORTNOSE     | FISH         | L             | 111            |
| <u>COUNTY: WASHINGTON</u><br>STURGEON, SHORTNOSE  | FISH         | L             | 2757           |

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**ENDANGERED/THREATENED SPECIES OCCURRING IN  
COUNTIES WHERE PEANUTS  
ARE GROWN**

**STATE: VIRGINIA**

|                                                 | <u>GROUP</u> | <u>STATUS</u> | <u>ACREAGE</u> |
|-------------------------------------------------|--------------|---------------|----------------|
| <u>COUNTY: DINWIDDIE</u><br>LOGPERCH, ROANOKE   | FISH         | P             | 2832           |
| <u>COUNTY: GREENSVILLE</u><br>LOGPERCH, ROANOKE | FISH         | P             | 9961           |
| <u>COUNTY: SUSSEX</u><br>LOGPERCH, ROANOKE      | FISH         | P             | 1196           |