

Patricia D. Hastings

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Sent: Sunday, July 04, 2004 3:47 PM
Subject: Cycloate Risk Assessments Open for Comment

Action: EPA has announced the availability of the human health and environmental fate and effects risk assessments and related documents for **cycloate** (S-Ethyl cyclohexylethylthiocarbamate). These risk assessments were developed as part of EPA's process for making pesticide Reregistration Eligibility Decisions (REDs) and tolerance reassessments under Federal law. It is open for public comment on or before July 12, 2004 (To view the documents, go to the EPA EDocket via <http://www.epa.gov/oppsrrd1/reregistration/cycloate/>).

Cycloate is a broad-spectrum, pre-emergent **thiocarbamate herbicide** registered for the control of annual grasses, nutgrass, certain perennial grasses and many broadleaf weeds on **red beets, spinach and sugar beets and proposed for Swiss chard**. Cycloate is not for homeowner/garden use. **Ro-Neet 6E Selective Herbicide EPA Registration number 73637-5-74530 is the only registered cycloate product in New Jersey.**

Background: EPA provides that some thiocarbamates (EPTC, molinate, pebulate, and cycloate) share as a **common mechanism of toxicity** the inhibition of acetylcholinesterase. Although structural and metabolic similarities exist among the thiocarbamates and there is evidence that the thiocarbamates may produce a common effect (neuropathology), this **evidence is not definitive**. Hence, (At this time), EPA has not assumed that cycloate has a common mechanism of toxicity with other substances. The RED will be a standalone document.

These risk assessments have identified data gaps in *both 'Human Health Data' and 'Ecological and Environmental Fate Requirements'* for cycloate; this data is necessary quantify risks so that adequate risk mitigation measures can be prescribed in the **pending RED**. There are multiple studies required in each of these area due to data gaps. See the risk assesment summary for the specific studies required. Further, EPA is requiring several studies by the registrant to be performed for reregistration eligibility for cycloate. Feedback will be used to complete the Reregistration Eligibility Decision (RED) document, which will include the resultant risk management decisions.

EPA is soliciting public comment on the risk assessments for cycloate. They request data or information to refine or characterize the occupational and ecological risk and/or practical mitigation measures to address the risks identified for cycloate. This information might include, but is not limited to, the following:

1. Information on the relative effectiveness and importance to growers of various application methods for cycloate;
2. Information on typical rates of application and typical number of acres treated with cycloate in a day, week or month;
3. Information on how dry bulk fertilizer is impregnated with liquid cycloate;
4. Information on the importance/frequency of banded applications for sugar beets; and
5. More specific data on the geographic extent of cycloate usage.

Sources: [Federal Register: May 12, 2004 (Volume 69, Number 92)][Notices][Page 26382-26384] <http://epa.gov/EPA-PEST/2004/May/Day-12/index.html>. EPA Memorandum: Thiocarbamates: A Determination of the Existence of a Common Mechanism of Toxicity and A Screening Level Cumulative Food Risk Assessment @ <http://www.epa.gov/oppsrrd1/cumulative/thiocarb.pdf>. See also in EPE eDocket for cycloate @ <http://www.epa.gov/oppsrrd1/reregistration/cycloate/>: 'Overview Of The Cycloate Risk Assessment, May 12, 2004'.

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See Farm Safety website @ <http://www.rce.rutgers.edu/farmsafety/>

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