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## THE STATUS OF THE ENDRIN RPAR

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*U.S. Environmental Protection Agency*

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## THE STATUS OF THE ENDRIN RPAR

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The Agency's "Preliminary Determination" published in the Federal Register on November 2, 1978 proposed that the use of endrin to control voles in apple orchards be continued providing that several modifications in the label be made. What I would like to discuss briefly are (1) some of the bases for the decision, (2), one of the new requirements, and (3) comments received from the Office of Endangered Species, U.S. Fish and Wildlife Service.

First let me emphasize that the proposed decision for this, and all other uses of endrin, was based on our current understanding of the relative risks and benefits associated with the use. The mere fact that the Agency has proposed continued registration should not be interpreted as a conclusion that there are no risks associated with the use. Unfortunately for all concerned, the risks from the use of endrin to control voles are not well documented and certainly not quantifiable because very little systematic monitoring has been done. I understand that the monitoring done here in New York in 1977 did reveal some adverse environmental effects and I trust the final report on the operation will give everyone a better assessment of the magnitude of the effects.

Second, the Agency is concerned that endrin be applied in as safe and efficacious a manner as existing technology permits. To that end, we have required that endrin be applied as a very coarse spray with minimum pressure necessary to penetrate ground cover. This requirement was prepared after consultation with Drs. Ross Byers, Don Hayne and Roger Young, all of whom agree that efficacy can be achieved under these conditions and that most spray equipment can be adjusted or modified to meet the requirements. The purpose of this requirement is to reduce environmental contamination and human exposure by reducing drift of the spray. In addition, application is prohibited within a distance of 50 feet from bodies of water and areas occupied by unprotected people.

We do have an educational problem associated with the requirement for a coarse spray. Last year Warren Smith showed a slide with two operators applying endrin with power hand guns and they were enshrouded in a cloud of spray. Although the operators appeared to be fully protected, such a situation would be inconsistent with the proposed restriction. At the December 1978 meeting of the FIFRA Scientific Advisory Panel, Warren showed a slide of a speed sprayer applying endrin and the billowing cloud generated by that sprayer again would be inconsistent with the requirement of a coarse spray. Methods for modifying most speed sprayers have been developed and it will be up to the several States to advise endrin users how to meet the requirements for generating a coarse spray. The Agency's Operations Division, Office of Pesticide Programs will assist in coordinating this educational effort.