



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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MEMORANDUM:

SUBJECT: Azinphos-methyl: Revision of Draft EFED Reregistration Eligibility Decision (RED) Science Chapter to Include Registrant's Comments

FROM: Jean Holmes, Biologists (Team Leader) *Jean Holmes 1/7/99*
Dave Jones, Agronomist (Fate and Water Resource Assessment)
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Environmental Fate and Effects Division (7507C)

THRU: Betsy Grim, Chief (Acting) *Betsy Grim 1-7-99*
ERBII/EFED (7507C)

TO: Barry O'Keefe,
Reregistration Branch 2
Special Review and Reregistration Division (7508C)

Attached please find a revised EFED Reregistration Eligibility Decision (RED) science chapter for azinphos methyl which includes corrections to errors identified by the registrant BAYER in their letter, "Response to the Draft EFED Reregistration Eligibility Decision (RED) Science Chapter for Azinphos-methyl, List A Case 0235".

The following changes identified by the registrant have been incorporated into the EFED science chapter:

o The typographical error on page 43 has been corrected from brown trout to brook trout.

o The common taxonomic usage of the test species for the studies (MRID # 41202002 and 4038052) will be corrected from Americamysis bahia or opossum shrimp to Mysidopsis bahia or mysid shrimp.

o The reformatting error in the maximum EEC, average maximum EEC and the Risk

quotients (RQ) for birds and mammals have been corrected.

- o All references to "Bayer Inc.'s" will be replaced with "Bayer Corporation's".
- o The inclusion of the table on pages 145 to 147 was in error; therefore, it has been deleted.
- o A brief description of the averaging period used to generate the average EEC's for the chronic risk to birds and mammals was added..
- o In the surface water assessment, an explanation of how the aerobic aquatic degradation rate was derived has been added. It is 3 times the aerobic soil metabolism input value in PRIZM.

The following issues raised by the registrant are addressed below but do not require a revision to the EFED science chapter.

- o An aerobic aquatic study (MRID 4411801), identified by the registrant, which is not included in the document. This study was reviewed by EFED and found to be invalid; therefore, it was not incorporated into EFED's assessment of azinphos methyl. The completed DER will be sent shortly.
- o A mesocosm study (MRID 41549401), identified by the registrant, which is not included in the document. This study was reviewed by EFED and found to be invalid; therefore, it was not incorporated into EFED's assessment of azinphos methyl.
- o In the surface water assessment, a value of $1.02 \times 10^{-4} \text{ h}^{-1}$ was used for the aerobic aquatic degradation rate. The correct value should be $1.51 \times 10^{-4} \text{ h}^{-1}$. However, since the hydrolysis rate was considered in the assessment, the corrected value of $1.51 \times 10^{-4} \text{ h}^{-1}$ does not make a significant effect on the results of the surface water assessment.

The following issues raised by the registrant will be addressed during the 60 day comment period:

- o Comments regarding the use of a monitoring study to establish the acute ground water exposure concentration.
- o The supplemental status of the Deer Mouse (MRID No. 408583-01) study.
- o EFED's interpretation of the terrestrial field and pen tests.
- o A rainbow trout study (MRID No. 158231), identified by the registrant, which is not included in the EFED chapter.

o A difference in NOEC for the Bobwhite reproduction study. This was not used in the risk assessment.

o The method used to derive the average EECs in the assessment of chronic risk to birds and mammals.

o The foliar half-life in supplemental studies conducted in Georgia and Mississippi.

o The registrants interpretation of the field dissipation studies in Georgia and Mississippi.

Attachments