



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

FEB 14 1989

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: ID No. 238607. Imidan (Phosmet) Plant Metabolism
Studies. Time Extension Request. No MRID No.
DEB No. 4863.

FROM: Linda S. Propst, Chemist
Dietary Exposure Branch
Health Effects Division (TS-769C)

Linda S. Propst

THRU: Andrew R. Rathman, Section Head
Special Registration Section 1
Dietary Exposure Branch
Health Effects Division (TS-769C)

APR

TO: Geraldine Werdig/Barbara Briscoe PM 50
Data Call-In Staff
Registration Division (TS-767C)

ICI Americas Inc. is requesting a time extension to complete the imidan plant metabolism studies required by the September 30, 1986 Guidance Document.

ICI Americas Inc. explained that when the Agency had required ¹⁴C-carbonyl or ring labeled imidan metabolism studies in an orchard tree fruit, potatoes and corn in addition to the already submitted cotton metabolism study, the company proposed in letters dated June 1, 1987 and August 31, 1987 deleting the corn and potato uses from the label in order to eliminate the requirement for the two additional metabolism studies. On December 23, 1987 the Agency agreed to allow the registrant to delete the corn and potato use but retained the requirement for two additional plant metabolism studies suggesting alfalfa and grapes. Thus the request to delete the corn and potato studies served no useful purpose, and ICI Americas Inc. elected to proceed with the corn and potato metabolism studies.

Due to delays in arriving at the decision to continue with the corn and potato metabolism studies and initiating these studies, the registrant is requesting an extension of 8 months to 5/90 instead of 9/89 for completion of these studies. The cherry metabolism study which the Agency requested is underway and planned for completion 9/89 as the Agency requested.

DEB's Comments

Since the need for a time extension to complete these metabolism studies is not for scientific reasons, it is not within the purview of Dietary Exposure Branch to recommend for or object to this extension request. Registration Division should make the decision regarding a time extension for the submission of these metabolism data.

cc: Reading File, Circulation, Subject File, Reviewer, PMSD/ISB
Branch Chief
RDI: A. R. Rathman, 2/14/89; E. Zager, 2/14/89
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