



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

JAN 5 1993

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Phosmet: Rat Chronic Testing Requirement

Assoc. with Proj. # 1-1683/D166028  
Assoc. with Submission #: S398754  
Tox. Chem #/PC #: 543/059201

FROM: Marion Copley, DVM, Section Head *Marion Copley*  
Section 4, Tox. Br. 1  
Health Effects Division (H7509C) *1/5/93*

TO: B. Lowery/L. Schnaubelt (PM #72)  
Reregistration Branch  
Special Review and Reregistration Division (H7508C)

THRU: William Greear, MPH *William Greear 1/5/93*  
Section 4, Tox. Br. 1,  
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CONCLUSIONS:

At the current time TB1 does not require additional data to fill the 83-1a guideline requirement for a chronic study in the rat using Phosmet. This issue however will be referred to the HED RfD/Peer Review Committee for further consideration as soon as possible.

ACTION REQUESTED:

Reregistration Branch (memorandum dated 12/21/92 from Lois Rossi to Karl Baetcke) requests clarification of the data requirements for a chronic rat feeding study to fulfill the guideline requirement for 83-1a. The original chronic study (MRID 00076436) was considered core minimum for the 83-1a series in the 1986 Registration Standard with a NOEL of 40 ppm. The TB1 memorandum dated 11/18/92 (from William Greear to Brigid Lowery) determined that this new rat chronic study (MRID 419164-01) is core-supplementary for 83-1a with a NOEL of less than 20 ppm.

**DISCUSSION:**

Since the NOEL for the newer study is lower than the old study, the new values would be used for regulatory purposes. In addition there were more animals in the newer study thus increasing the confidence in that study. However, the treatment related effects that occur at the low dose are limited to minor (16%) statistically significant inhibition of RBC cholinesterase (only at the 6-month interval) and fatty infiltration of the liver (12 and/or 24 months). Due to the lack of effects in other parameters including clinical chemistries, and organ weights, the relevance of these effects is questionable.

This issue will be referred to the HED RfD/Peer Review Committee as soon as the new Phosmet 2-generation reproduction study has been reviewed. They will be requested to consider the most appropriate method to determine a NOEL for this study and to determine what endpoint to base the RfD on. If this committee determines that a new study or additional data is required, SRRD will be notified.

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