041701

Shaughnessy #: 041701

EAB Logout Date: JAN 16 1985

Signature:

TO: W. Miller
Product Manager #16
Registration Division (TS-767)

FROM: Lionel A. Richardson, Chief
Environmental Chemistry Review Section #3
Exposure Assessment Branch (TS-769C)
Hazard Evaluation Division

Attached please find the EAB Review of...

Reg./File No.: 476-2134

Chemical: Fonofos

Type Product: I

Product Name: DYFONATE

Company Name: Stauffer

Submission Purpose:

ZBB Code: ACTION CODE: 656

Date In: 1/2/85 EAB #: 5233

Date Completed: TAIS (level II) 42 Days 3

Defferals To:

_____ Ecological Effects Branch

_____ Residue Chemistry Branch

_____ Toxicology Branch

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

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

Response to Stauffer's fonofos Re-entry Labeling Requirement (132-1) (9/17/84 letter) and Registration Standard Re-entry Letter of October 8, 1984.

Thank you for your commitment to submit re-entry draft protocols for Agency review in December, 1984, and to make re-entry data available in December 1985.

As you stated in your October 8, 1984 letter, we also believe that reentry intervals must be based on scientific data, and for that reason we established re-entry (scientific) data requirements for reregistration. However, until you submit re-entry data, the interim 24-hour re-entry interval, for foliar applications, will offer some measure of protection to field workers.

For soil incorporated fonofos applications, an interim 24-hour re-entry interval will not be necessary if a label statement requiring rubber or neoprene boots is used. For example, "Do not enter treated areas during the growing season without wearing neoprene or rubber boots."

Your October 8, 1984 letter proposed that State and local re-entry requirements be followed until scientific re-entry data are available to determine appropriate intervals. How many States or local governments have established scientific or arbitrary re-entry intervals?

As an interim measure the Agency requires "watering in" on the 2G label for the home lawn use. After the required data are received, we will reassess all of the interim measures and establish safety measures that the data, from acceptable studies, dictate.

John Hunt Jordan

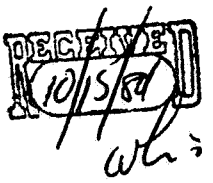
DE GUIGNÉ
TECHNICAL CENTER
ENVIRONMENTAL SERVICES

Stauffer Chemical Company

1200 S. 47th St. / Richmond, CA 94804 / Tel. (415) 231-1000 / TWX (910) 382-8174

October 8, 1984

Mr. William H. Miller
Product Manager (16)
Insecticide-Rodenticide Branch
Registration Division (TS-767)
U.S. Environmental Protection Agency
401 M Street, S.W.
Washington, DC 20460



Subject: Fonofos Registration Standard
Re-Entry Discussion of October 3, 1984

Dear Mr. Miller:

Thank you once again for the opportunity to discuss our concerns regarding the Agency's requirement to incorporate a 24-hour re-entry interval for all uses of all products containing fonofos.

Stauffer recognizes that some uses of pesticide products will require field reentry instructions. In the case of DYFONATE products, there are two issues to address for general agricultural uses:

1. Pre-plant incorporated or at planting incorporated uses

2. Post-emergence crop uses

In the case of pre-plant incorporated or at planting incorporated uses of DYFONATE, Stauffer agrees with EPA scientific review that there is little potential for farmworker exposure and a label caution is all that is needed (See Attachment 1). EPA scientists have also pointed out that for other products of similar use, i.e., terbufos, there is little potential for re-entry exposure (see Attachment 2). Stauffer supports these conclusions and we propose that no re-entry requirements are needed for Dyfonate pre-plant incorporated or at planting incorporated uses.

For post-emergence uses on corn we propose adding to the DYFONATE label alternate language directing the user to follow State or local re-entry requirements until data are available to determine an appropriate re-entry interval.

Further to our discussions of October 3, 1984, we believe that the arbitrary imposition of a 24-hour re-entry interval could, under certain use situations, give the user an erroneous indication that re-entry is safe. As an example, fonofos products are not currently recommended by states or local agencies for use on corn prior to detasseling for seed corn production, because a re-entry interval has not been established. With a 24-hour re-entry statement on the label a user may be able to treat and then 24 hours later send in workers to detassel the corn. This may not be a safe practice. It is our understanding that the 24-hour re-entry interval was an EPA policy decision which was not based on scientific evidence.

Stauffer agrees that further studies should be conducted to determine whether a re-entry interval is required for fonofos's various uses and formulations. We have notified the Agency of this.

As agreed, we will add the 24-hour re-entry statement to the Dyfonate 5-G and Dyfonate 2-G labels in compliance with the requirements of the Standard. Draft labeling will be submitted by October 31, 1984. These products are not currently in trade channels. Prior to the introduction of these products into the market studies will also be conducted to establish an appropriate re-entry interval for their use.

We are currently preparing protocols and scheduling studies to address these re-entry issues. We expect to provide the Agency with draft protocols for review and approval by December 31, 1984 and to provide actual scientific data no later than December 31, 1985.

If you have further questions regarding this matter, please call me at (415) 231-1177.

Sincerely,

STAUFFER CHEMICAL COMPANY

Ralph L. Riggs

Ralph L. Riggs
Senior Regulatory Affairs Supervisor
Pesticide Registrations

MSO/rrc

Attachments

cc: Herbert S. Harrison