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

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

December 16, 1998

MEMORANDUM

SUBJECT: Response to Comments Detailing Errors in the Draft EFED RED Chapter for **Methyl Parathion**
PC Code No. ~~109401~~ 053501; Case No. **2345**

TO: Emily Mitchell, Chemical Review Manager
RB III, Special Review and Reregistration Division (7508W)

FROM: Kevin Costello, Geologist, Task Leader
Environmental Risk Branch 1
Environmental Fate and Effects Division (7507C)

THROUGH: Arnet Jones, Chief
Environmental Risk Branch I / EFED (7507C)

The Office of Pesticide Programs offered registrants of organophosphate pesticides a 30-day period for the review of the draft RED chapters in order to identify typographical, mathematical and transcription errors. Although in some cases a registrant may raise other than clear errors as part of the 30-day review, EFED will give careful consideration to scientific questions after the public comment period. Cheminova, through their consultant Jellinek, Schwartz and Connally, has provided three pages of comments for this round of review of the EFED RED chapter. Responses to those comments are detailed below. The responses either: 1) detail the corrections made to EFED's RED chapter, 2) explain why suggested changes were not made, or 3) indicate that a particular comment was outside the scope of "typographical, mathematical and transcription errors".

A. Use Patterns for Methyl Parathion

Comment 1: EFED included artichokes on a list on page 38 of crops for which Cheminova will no longer support the use of methyl parathion. Cheminova indicates that they support the use of the

EC formulation for this crop.

Response: Artichokes were removed from this list, as this information is consistent with information provided by Cheminova to EFED in the "smart meeting" for methyl parathion.

Comment 2: *"...on page 8, EPA states that a USGS review reported methyl parathion in air samples associated with the use of methyl parathion in tobacco production. Because methyl parathion is not being supported for use on tobacco, Cheminova believes the reference to tobacco is not relevant for this risk assessment and should be deleted."*

Response: Since tobacco was only one of several crops included in the USGS study, and the others will be supported after reregistration, the results of the study are still relevant. However, EFED added a sentence that reminds the reader that use of methyl parathion on tobacco will not be supported.

Comment 3: The RED chapter lists "*sorghum as one of the crops included in EFED's risk assessment. Cheminova is not supporting the use of methyl parathion on sorghum. Cheminova is not aware of any registrant interested in supporting this use.*"

Response: This memo, which was prepared by consulting firm Jellinek, Schwartz and Connally, contradicts tables on supported crops provided to EFED by Cheminova during the "smart meeting" for methyl parathion. No changes were made for this round of revision. EFED will consult with Cheminova and SRRD, and ensure that the next draft reflects the accurate registration status of methyl parathion use on sorghum.

Comment 4: *"The tables on pages 50 and 51 list ornamental herbs and uncultivated agricultural lands as uses included in EFED's risk assessments. Cheminova is not supporting these uses for reregistration."*

Response: This information is consistent with information provided by Cheminova in the "smart meeting" for methyl parathion. These uses have been removed from the tables.

Comment 5: *"The tables on pages 62 and 67 that peaches are included as a surrogate for citrus. Methyl parathion is not used on any citrus crop."*

Response: The reference to citrus has been deleted, as this information is consistent with information provided in the "smart meeting".

Comment 6: On page 74, EFED references modeling done on nonagricultural lands.

Response: This language has been removed, and the assessment states that rice has the lowest application rate, not nonagricultural lands.

Comment 7: Methyl parathion is used on 50 crops, not 48, as indicated in the transmittal memo.

Response: The transmittal memo has been revised to reflect this.

Comment 8: The shortest permissible interval between applications to cotton is 3 days, not 7.

Response: Page 2 of the transmittal memo has been revised to reflect this.

Comment 9: Cheminova does not produce all the technical methyl parathion sold in the United States.

Response: The section "Introduction and Use Characterization" has been corrected to reflect this.

B. Environmental Fate Assessment

Comment 1. *"For the Pesticide Root Zone Model (PRZM), EFED used different values for the adsorbed and aqueous aerobic soil half-lives in different scenarios."*

Response: The choice and appropriateness of modeling input parameters are not being considered during this round of revision.

Comment 2: The maximum ground-water concentration detected in the USGS NAWQA program is listed in the EFED chapter as 0.062 ppb. There were no detectable concentrations.

Response: The USGS World Wide Web page Pesticides in Surface and Ground Water of the United States: Summary of Results of the National Water Quality Assessment Program (NAWQA) (http://water.wr.usgs.gov/pnsp/allsum/, last modified October, 1998), indicates that the maximum concentration detected was 0.062 ppb. This data is listed as "Provisional Data-Subject to Revision". The EFED RED chapter will not be changed at this time. The USGS will be consulted to confirm this value.

Comment 3: EFED assumes no foliar dissipation in its PRZM/EXAMS modeling, but states elsewhere in the RED chapter that the upper 90th percentile confidence limit value for the foliar half-life is 2.4 days.

Response: The choice and appropriateness of modeling input parameters are not being considered during this round of revision.

C. Ecological Risk Characterization

Comment 1: *"On page 30, the sentence before the Avian Acute Dermal Toxicity table is an incomplete sentence."*

Response: It has been corrected.

Comment 2: *"Neither Kirschneria subcapitatum or* (sic) *Anabaena flos-aquae are diatoms as stated by EFED on page 38. In addition, Kirschneria subcapitatum is not a marine species."*

Response: In that section, the species Skeletonema costatum and Navicula pelliculosa are now cited instead.