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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

February 22, 2000

MEMORANDUM

SUBJECT: Review of Draft Protocol: Postapplication Exposure Monitoring: Foliar Dislodgeable Residue Dissipation of Penncap-M® on Sweet Corn

FROM: Jonathan Becker, Ph.D., Environmental Health Scientist
Reregistration Branch II
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TO: Laura Parsons
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Special Review and Reregistration Division (7508W)

THRU: Al Nielsen, Senior Scientist
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Please find attached a review of a study protocol addressing foliar dislodgeable residue dissipation of Penncap-M® on Sweet Corn.

DB Barcode: D261457

Pesticide Chemical Code: 053501

Table 1: Identifying Information

Title:	Postapplication Exposure Monitoring: Foliar Dislodgeable Residue Dissipation of Penncap-M® on Sweet Corn
Sponsor(s):	Elf Atochem North America, Inc.; Agrichemicals Division; 2000 Market Street, 21st Floor; Philadelphia, PA 19103-3222
Testing Facility:	Grayson Research, LLC.; 1040 Grayson Farm Road; Creedmoor, NC 27522
Study Director:	William P. Barney (Grayson Research, LLC.)
Analytical Lab:	Morse Laboratories, Inc.; 1525 Fulton Avenue; Sacramento, CA 95825
MRID Number:	449842-02
Protocol Date	01 November 1999
Other Identification Codes:	KP-99-16

HED has reviewed this study protocol and determined that it is not acceptable as presented. Deficiencies and issues are described below.

Study objective. It is the Agency's understanding that this study will be used with biomonitoring data, not with generic worker activity transfer coefficients (pp 5). Please clarify.

Application rate. The OPPTS guidelines state that the study must be conducted at the maximum label rate for the crop used. The study proposes to use a application rate of 0.5 lb ai/acre for corn. The current label rate for corn (EPA Reg. No. 4581-393) is 1.0 pounds active ingredient per acre (4 pints formulation per acre). The Agency will "scale" all results from the proposed study to account for the difference in label and study application rates. This would be achieved by multiplying all values (including ½ LOD for non-detects) by two to scale-up from an application rate of 0.5 lb ai/acre to that of 1.0 lb ai/acre.

Geographic location of study trials. The protocol indicates that three locations will be used – two in Florida and one in California. The cover letter indicates that the three locations will be in Florida, Texas, and California. Please clarify. The Agency would prefer study locations in three different regions that represent the major production areas for U.S. sweet corn. Please justify conducting the study in only two geographic locations.

Dislodging of Leaf Discs. The description of the removal of the leaf discs from the dislodging solution (pp. 12, paragraph 4) erroneously includes reference to acidifying urine samples with hydrochloric acid. Please correct.

Field fortification samples. Specify number of leaf punches and their surface area per leaf disk sample (pp. 13).