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



OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

January 27, 2000

MEMORANDUM

SUBJECT: Review of Draft Study Protocol: Postapplication Exposure Monitoring: Foliar Dislodgeable

Residue Dissipation of Penncap-M® on Walnuts

FROM: Jonathan Becker, Ph.D., Environmental Health Scientist

Reregistration Branch II

Health Effects Division (7509C)

TO: Laura Parsons

Reregistration Branch I

Special Review and Reregistration Division (7508W)

THRU: Al Nielsen, Senior Scientist

Reregistration Branch II

Health Effects Division (7509C)

Please find attached a review of a study protocol addressing mixer / loader exposure (for aerial application) to Penncap-M using biological monitoring.

DB Barcode: D261459

Pesticide Chemical Code: 053501

Table 1: Identifying Information

Title:	Postapplication Exposure Monitoring: Foliar Dislodgeable Residue Dissipation of Penncap-M® on Walnuts
Sponsor(s):	Elf Atochem North America, Inc.; Agrichemicals Division; 2000 Market Street, 21 st Floor; Philadelphia, PA 19103-3222
Testing Facility:	Excel Research Services, Inc., 3021 W. Dakota, Suite 110, Fresno, CA 93722
Study Director:	Tami I. Belcher (Excel Research Services, Inc.
Analytical Lab:	Morse Laboratories, Inc. 1525 Fulton Avenue Sacramento, CA 95825
MRID Number:	449842-05
Protocol Date	01 November 1999
Other Identification Codes:	KP-2000-03; ERS 20003

HED has reviewed this study protocol and determined that the following areas require additional description and discussion:

<u>Study Location.</u> The OPPTS Guideline specifies that studies should be conducted at three geographic locations. Provide additional information justifying the use of only two locations for the proposed study.

<u>Relationship of Studies.</u> Please include a description of the inter-relationship of this study with other studies (e.g., KP-2000-05, KP-2000-06) being conducted on walnuts for methyl parathion, if any.