

Shaughnessy No.: 058001
MAR 1 1988
Date Out of EAB: _____

TO: P. Jenkins
Product Manager #12
Registration Division (TS-767C)

FROM: Emil Regelman, Supervisory Chemist
Environmental Chemistry Review Section #3
Exposure Assessment Branch/HED (TS-769C)

THRU: Paul F. Schuda, Chief
Exposure Assessment Branch/HED (TS-769C)

R

Paul F. Schuda

Attached, please find the EAB review of...

Reg./File #: 3125-108

Chemical Name: Azinphos-methyl

Type Product: Insecticide/acaricide/molluscicide

Product Name: GUTHION®

Company Name: MOBAY Corporation

Purpose: To comment on the waiver request submitted in response to
registration standard

Date Received: 10/6/1987

Action Code: 660

Date Completed: 2/29/1988

EAB #(s): 80294

Monitoring study requested: _____

Total Reviewing Time: 1
day

Monitoring study voluntarily: _____

Deferrals to:

_____ Ecological Effects Branch

_____ Residue Chemistry Branch

_____ Toxicology Branch

1. CHEMICAL:

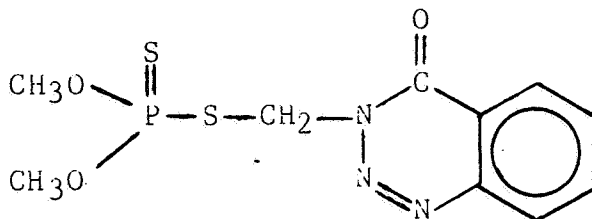
Common Name: Azinphos-methyl

Chemical Name: O,O'-Dimethyl-S-[(4-oxo-1,2,3-benzotriazin-3(4H)-yl)methyl]phosphorodithioate

Chemical Abstracts #: 86-50-0

Product Name: GUTHION® (Mobay)

Structure:



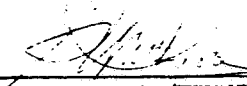
2. TEST MATERIAL: Not applicable.

3. STUDY/ACTION TYPE: To comment on the waiver request submitted in response to registration standard.

4. STUDY IDENTIFICATION: Letter of John S. Thornton from MOBAY Corporation dated September 25, 1987 to Mr. Dennis Edwards, EPA Registration Division in regards to the reregistration of pesticide products containing azinphos-methyl. A copy of this letter is attached.

5. REVIEWED BY:

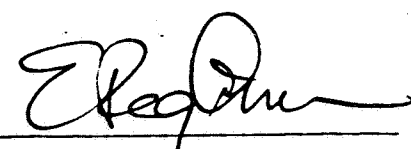
Silvia C. Termes
Chemist, Review Section #3
EAB/HED/OPP

Signature: 

Date: March 1st, 1988

6. APPROVED BY:

Emil Regelman
Supervisory Chemist
Review Section #3
EAB/HED/OPP

Signature: 

Date: MAR 1 1988

7. CONCLUSIONS:

Because Mobay has removed forestry uses from all of its azinphos-methyl (GUTHION®) labels, the following data requirements can be waived:

162-3	Anaerobic Aquatic Metabolism*
164-3	Forestry Field Dissipation
165-5	Accumulation in Aquatic Non-Target Organisms

*Azinphos-methyl (GUTHION) is not registered for aquatic uses.

In an EAB review (Eiden, 3/17/1986), it was concluded that a pine seed orchard is not "forest-like" in its setting. The Forestry Dissipation Study (164-3) was waived at that time.

The use of azinphos-methyl (GUTHION®) in a pine seed orchard does not constitute a forestry use and, therefore, the other two data requirements (Anaerobic Aquatic Metabolism, 162-3; Accumulation in Aquatic Non-Target Organisms, 165-5) can be waived.

8. RECOMMENDATIONS:

The registrant should be informed that EAB concurs with waiving the Anaerobic Aquatic Metabolism (162-3), the Forestry Dissipation (164-3), and the Accumulation on Aquatic Non-Target Organisms (165-5) data requirements since azinphos-methyl (GUTHION®) no longer has forestry uses.

9. BACKGROUND:

Azinphos-methyl (GUTHION®) is an insecticide/acaricide/molluscicide registered for use on a variety of terrestrial food and nonfood crops. Forestry uses have been removed from all GUTHION labels. Application rates range from 0.125 to 2.4 lb a.i./A. It can be available as single-active ingredient formulations or formulated with other pesticides (endrin, ethylene dichloride, methyl parathion, parathion, captan, sulphur, terbam, and zineb).

10. DISCUSSION OF INDIVIDUAL STUDIES:

Mobay has requested that the data requirements for Anaerobic Aquatic Metabolism (162-3), Forestry Field Dissipation (164-3), and Accumulation in Aquatic Non-Target Organisms (165-5) be waived because all forestry uses have been removed from all azinphos-methyl (GUTHION®) labels. Pine seed orchards are not considered forestry-like settings.

11. COMPLETION OF ONE-LINER: N/A.

12. CRI APPENDIX: No CRI.

Mobay



Mobay Corporation
A Bayer USA INC. Company

CERTIFIED MAIL 488 523 942

Agricultural Chemicals Division

Mr. Dennis Edwards
Product Manager (12)
Environmental Protection Agency
Registration Division (TS-767C)
401 M Street, S.W.
Waterside Mall
Washington, D.C. 20460

P.O. Box 4913
Hawthorn Road
Kansas City, MO 64120-0013
Cable: Kemagro Kansas City
Telephone: 816 242-2000

September 25, 1987

Subject: Reregistration of Pesticide Products
Containing Azinphos-Methyl

Dear Mr. Edwards:

With regard to the subject process, the azinphos-methyl guidance document contains three data requirements on pages 105 and 106 which pertain to forestry uses. They are the following:

<u>EPA Guideline No.</u>	<u>Study Type</u>
162-3	Anaerobic Aquatic Metabolism
✓ 164-3	Forestry Field Dissipation
165-5	Accumulation in Aquatic Non-Target Organisms

All three of these requirements have the same explanatory footnote (footnote number 5 on page 107) which states the following:

These data may be waived if forest use is removed from the label, or if the use is defined as referring to tree plantations that are not truly forest environments.

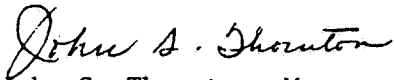
In accordance with the above guidance document footnote, we request that the 162-3, 164-3 and 165-5 forestry data requirements be waived because Mobay has removed all forestry uses from our GUTHION labels.

In explanation, on 7/25/84 a Special Data Call-In Notice for Ground Water Data for Azinphos-Methyl was issued. This notice required much data including 162-3 and 164-3 data (165-5 was not required in the ground water notice). Mobay requested that the 162-3 and 164-3 data requirements be waived provided Mobay removed forestry uses from all our GUTHION labels. In Mr. J.W. Akerman's 9/22/86 letter, the Agency agreed with our request. The Agency also reviewed the pine seed orchards use remaining on our GUTHION labels and stated, "The Agency has reviewed your request and determined that the forestry dissipation study (164-3) and the anaerobic aquatic metabolism (162-3) data requirements are not applicable to the use of azinphos-methyl in pine seed orchards at this time." Accordingly, on 10/23/86 Mobay submitted the revised labels, and they were acknowledged in Mr. D. Edwards 2/25/87 letter.

If you have any questions on this matter, please advise.

Yours very truly,

MOBAY CORPORATION
AGRICULTURAL CHEMICALS DIVISION


John S. Thornton, Manager
Registrations
Research and Development

JST:FTM:brh

cc: Laboratory Data Integrity Program
Office of Compliance Monitoring (EN-342)