

Shaugh. No. 058001

EAB Log Out Date SEP 30 1986

Init. SMA

To: Ms. Geraldine Werdig, PM-50 and
Mr. Larry Schnaubelt, PM-12
Registration Division (TS-767)

From: Carolyn K. Offutt *Carolyn K. Offutt*
Chief, Environmental Processes and Guidelines Section
Exposure Assessment Branch, HED (TS-769)

Attached please find the review of:

Reg./File No.: _____

Chemical: Azinphos Methyl

Type Product: Insecticide

Product name: Guthion

Company name: Mobay

Submission Purposes: Proposed (3/24/86 Mobay letter) reduction of the number of applications specified on the label without further change in the tolerance.

ZBB Code: _____

Action Code 400

Date In: 4/2/86

EAB #: 6495

Date Completed: 9/23/86

Days

2.0

Deferrals To:

☐ Ecological Effects Branch

☐ Residue Chemistry Branch

☐ Toxicology Branch

Monitoring study requested by EAB: ☒

Monitoring study voluntarily conducted by registrant: ☐

Review of Proposed Reduction of Application Rate

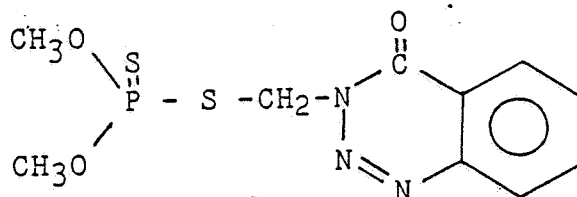
1. CHEMICAL:

Chemical name: O,O-Dimethyl S-(3,4-dihydro-4-oxobenzo[d][1,2,3]-
triazin-3-ylmethyl) phosphorodithioate

Common name: Azinphos Methyl

Product name: Guthion

Structure:



2. TEST MATERIAL:

Not applicable

3. STUDY/ACTION TYPE:

Review of Proposed (3/24/86 Mobay letter) reduction of the number of applications specified on the label without further change in the tolerance.

4. STUDY IDENTIFICATION:

Title: Mobay Letter Written 3/24/86

Author: G. E. Brussell

Draft Protocol No: Not Included

Submitted by: Mobay Chemical Corporation with letters to Larry Schnaubelt

Issue Dates: 4/1/86 (Date Received at EPA)

Accession No: None

5. REVIEWED BY:

Linda L. Kutney, Chemist

Environmental Processes and Guidelines Section/EAB/HED

Linda L. Kutney Date 9/29/86

6. APPROVED BY:

Carolyn K. Offutt, Chief

Environmental Processes and Guidelines Section/EAB/HED

Carolyn K. Offutt Date 9/29/86

7. CONCLUSIONS:

Mobay proposed to decrease the number of applications used for the reentry study to less than the rate on the label and use the data collected to propose a suitable reentry interval on a revised label. The data would not be appropriate for support of the existing label conditions. The data may be used (provided they are adequate) to support a reduction in the number of applications and a suitable reentry interval for a new, revised label.

8. RECOMMENDATIONS:

The detailed comments and conclusions concerning the proposals submitted by Mobay should be forwarded to the Company.

Data derived using fewer applications than are included on the present guthion label are not ~~be~~ appropriate for proposing a suitable reentry interval for the existing label. We recommend that this proposal be implemented provided the data are used to propose an appropriate label.

9. BACKGROUND:

The Mobay Chemical Corporation has proposed (See the 3/24/86 letter to Mr. Larry Schnaubelt, PM-12, received at EPA on 4/1/86 and material previously sent on 8/22/85) that they decrease the number of applications specified on the Guthion label (target crops not specified). They want to keep the food tolerance unchanged, and use the results of the studies to reduce the number of applications and propose a suitable reentry interval which would appear on a revised label.

10. DISCUSSION:

Mobay's proposal to decrease the number of applications specified on the guthion label (target crops not specified) without providing additional data has been approved by R. Schmitt of Residue Chemistry, provided the existing food tolerance is not changed. Chemistry's reasoning is that data are not specifically required by the EPA for such a decrease of application rate on the label. Mobay wishes to use the results of the studies to reduce the number of applications and propose a suitable reentry interval which would appear on a revised label, at a later time.

According to Section 132-2 of the Pesticide Assessment Guidelines, Subdivision K for Exposure (Reentry Protection)

"Dissipation of Dislodgeable Residues, Part (4), Method of Application," application of the test substance should be accomplished by methods recommended for the end-use product, at the least dilution and highest rate permitted for that end-use product. For this reason, the data for proposing a suitable reentry interval, derived following fewer applications than included on the present guthion label, would not be appropriate for support of the existing label conditions. However, if this proposal is followed by Mobay, the data may be used to support a reduction in the number of applications on a revised label, and a suitable reentry interval (provided the data are adequate). potatoes.

We reiterate our concern that the maximum number of treatments proposed on the revised label should be used to calculate the proper reentry period. This would be in accordance with the Guidelines §132-2(4).

11. ONE LINER:

Not applicable

12. CONFIDENTIAL BUSINESS INFORMATION:

None