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Shaughnessy No.: 058001

Date Out of EAB: AUG - 6 1987

To: D. Edwards/ Jenkins
Product Manager # 12
Registration Division (TS-767)

From: Therese M. Dougherty, Chief
Environmental Chemistry Review Section 1
Exposure Assessment Branch
Hazard Evaluation Division (TS-769-C)

TD

Attached, please find the EAB review of...

Reg./File # : 3125-193
Chemical Name: Azinphos methyl
Type Product : Insecticide
Product Name : Action relates to all products with azinphos methyl
Company Name : Mobay Chemical Corp
Purpose : Review mesocosm test protocol as required by registration
standard.

Action Code: 352

EAB #(s): 70577

Date Received: 5/8/87

TAIS Code: ---

Date Completed: AUG - 6 1987

Total Reviewing Time: 0.5 day

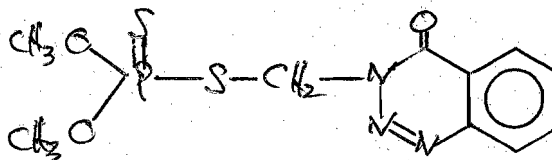
Monitoring study requested:

Monitoring study voluntarily:

Deferrals to: X Ecological Effects Branch
 Residue Chemistry Branch
 Toxicology Branch



2040102

1. CHEMICAL:Common Name- azinphos-methyl (Guthion)Chemical Name- O,O-dimethyl-S-[4-oxo-1,2,3-benzotriazin-3(4H)-ylmethyl] phosphorodithioateTrade Name- Not applicable.Chemical Structure-2. TEST MATERIAL: Not applicable.3. STUDY/ACTION TYPE: Mobay Chemical Corp. is submitting a Study Plan and Test Protocol in response to the azinphos methyl registration standard (issued 9/11/86) requirement for a "Simulated or Actual Field Testing for Aquatic Organisms (§ 72-7)."4. STUDY IDENTIFICATION: Mesocosm Test for Environmental Fate and Ecological Effects of Guthion, March 1987.5. REVIEWED BY:

Herbert L. Manning, Ph.D.
Microbiologist
EAB/HED

Signature: *Herbert L. Manning*
Date:

AUG - 6 1987

6. APPROVED BY:

Therese M. Dougherty, Chief
Section 1
EAB/HED

Signature: *Therese M. Dougherty*
Date:

AUG - 6 1987

7. CONCLUSION:

See RECOMMENDATION.

8. RECOMMENDATION:

EAB is returning this protocol to RD without reviewing it, because it is a study that the Ecological Effects Branch reviews and it should not be sent to EAB.

Chase

9. BACKGROUND:

A. Introduction

See Secion 3 of this review.

B. Directions for Use

Not applicable.

10. DISCUSSION OF INDIVIDUAL STUDIES:

Not applicable. No study appropriate to EAB was submitted.

11. COMPLETION OF ONE-LINER:

Not applicable.

12. CBI:

None submitted.

Mobay



Mobay Corporation
A Bayer USA INC. Company

CERTIFIED MAIL 584 709 469

Agricultural Chemicals Division

Mr. Dennis Edwards
Product Manager (12)
Environmental Protection Agency
Registration Division (TS-767C)
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April 28, 1987

Subject: Reregistration of Pesticide Products
Containing Azinphos-Methyl

Dear Mr. Edwards:

In the guidance document (issued 9/11/86) for the subject reregistration, there is a requirement for "Simulated or Actual Field Testing for Aquatic Organisms (No. 72-7)." Enclosed for the Agency's review are two copies of Mobay's protocol for satisfying this requirement. The protocol is entitled "STUDY PLAN AND TEST PROTOCOL: Mesocosm Test for Environmental Fate and Ecological Effects of GUTHION."

Please note, Mobay is proposing to do a mesocosm study based on guidance from the Agency. The azinphos-methyl guidance document (Footnote No. 9, page 116) states: "However, a mesocosm study, using both fish and aquatic invertebrates, is likely to be more applicable to (all) registered sites."

In addition, Mobay recently received an Agency review of a protocol for an aquatic field study with reference to Mobay's pending registration of BAYTHROID 2 for use on cotton, EPA File Symbol 3125-GLR. Briefly, the Agency rejected the field study protocol and indicated a mesocosm study would be preferable.

If the Agency agrees with our proposed mesocosm size, type and location (Stanley, Kansas), then (weather permitting) Mobay will start construction of the ponds. Please note, after the construction of the ponds and introduction (at various stages) of all the aquatic organisms, our protocol calls for a one year equilibration of the ponds before treatment. This period is identical to the equalibration period recommended in the Agency's 1/22/87 Draft Guidelines for Aquatic Mesocosm Tests To Support Pesticide Registrations.

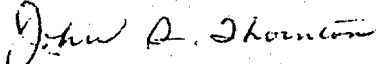
After equilibration of the ponds, treatment will be conducted in the spring and summer (normal application times) and post treatment sampling and analysis will continue through the remainder of the treatment calendar year. Report preparation should be complete in spring of the calendar year following treatment year.

We trust that the due date for the completed report will reflect these time frames once the ponds are constructed.

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

Yours very truly,

MOBAY CORPORATION
AGRICULTURAL CHEMICALS DIVISION


John S. Thornton, Manager
Registrations
Research and Development

JST:FTM:brh

Enclosures: Protocol (2 copies)

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