



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

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OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

Subject: Dichlorvos (DDVP) Registration Standard:
Questions Pertaining to Residue Chemistry Data
Requirements for Storage Stability Studies and
Residue Data (No MRID No., HED Project No. 0-
1503, DEB No. 6809)

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and

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Amvac Chemical Corporation, represented by the firm of
Jellinek, Schwartz, Connolly, and Freshman, Inc., in a letter
submitted June 18, 1990, requests clarification regarding two
residue chemistry studies required in the DDVP Registration
Standard of September, 1987.

CONCLUSIONS

1. If no crop uses of DDVP are retained, storage stability
studies using "weathered residue" samples are not required.
Storage stability data generated from fortified samples will
be adequate.
2. Residue data are needed on bulk-stored peanuts. Data on bulk-
stored in-shell walnuts may not be extrapolated to cover
peanuts for the following reasons:

- Peanuts and walnuts do not belong to the same crop group.
- The size and shell characteristics of these two commodities differ significantly, therefore residue levels may also differ.

RECOMMENDATIONS

DEB recommends in favor of a data waiver for storage stability data using weathered samples. Since no crop uses are being retained, storage stability data on fortified samples will be adequate.

DEB recommends against extrapolation of residue data on bulk-stored in-shell walnuts to cover peanuts. Residue data are needed on bulk-stored peanuts as described in the registration standard.

DETAILED CONSIDERATIONS

The letter cited above, states that AMVAC is not supporting any field uses for DDVP and requests that EPA waive the requirement to submit storage stability data using weathered samples. This issue was previously addressed in the RCB (DEB) memo of May 15, 1988 (Response to Questions Regarding Residue Chemistry Data Requirements Listed in the Dichlorvos (DDVP) Registration Standard, Debra Edwards). The conclusion from that review is reiterated below.

"If no crop uses of DDVP are retained, storage stability studies using "weathered residue" samples are not required. Storage stability data generated from fortified samples will be sufficient."

The registration standard requires residue data on peanuts as a bulk-stored commodity. The registrant states that in-shell peanuts and in-shell walnuts have high oil contents and similar matrices, and proposes that data generated for bulk-stored walnuts be extrapolated to cover peanuts. DEB recommends against this proposal. It should be noted that the subject commodity is not in the tree nut crop grouping. In addition, differences in the size of in-shell peanuts and in-shell walnuts, as well as the dissimilarity of shell structure and permeability make it possible for significant differences in residue levels to occur. DEB reiterates that residue data are needed on peanuts as a bulk-stored commodity.

cc: Dichlorvos (DDVP) Registration Std. File, SF, RF, E. Haeberer, W. Boodee, R. Schmitt, J. Burrell, (PIB/FOD), C. Furlow (PIB/FOD), E. Saito (TOX), M. Hawkins (HED), P. Fenner-Crisp (HED), Circu (7)