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Reevaluation of Pesticide Petition No. 0F0991 for 2-chloro-1-(2,4-dichlorophenyl) vinyl diethyl phosphate (Supona) Submitted by William Cooper and Nephews, Inc. Filed December 1, 1970, Revised July 27, 1971

Introduction

- 1. See our evaluation dated February 18, 1971.
- 2. See our opinion dated March 11, 1971.
- 3. On July 22, 1971, the petitioner responded to questions in our memorandum as follows:
- 1. The identity of the more than the technical product are:

It is always present in the technical product but has never been found in crops when Cpd. 4072 is used as soil treatments.

As a practical matter all of such are never completely removed and the amount remaining in technical Cpd. 4072 is typically of the order of These consist principally of starting materials and starting material impurities such as

- 2. is a manufacturing impurity.
- 3. A method of anlaysis, recovery, and raw data are submitted.
- 4. The metabolite possibly present as a non-phosphorus. Residue
- 5. The proposed tolerances may be in fact lower than the natural background. The petitioner is, therefore, proposing the following changes:
 - 0.005 ppm in milk
 - 0.005 ppm in fat
 - 0.005 ppm in eggs
 - 0.005 ppm in tissues of chickens.

- 6. Label directions for Copper Residual Surface Spray and Larvacide have been revised to be more specific as to the use of the product.
- 7. Data are submitted showing that treated manure containing Supona and/or its degradation products will not result in residues in the food chain.

The petitioner's responses to our questions are satisfactory.

II. Conclusion and Recommendation

A favorable opinion is given.

70-15 data not need with this type use.