

29/OPP#34134 (2PP)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

FEB 13 1995

Mr. John S. Thornton
Manager, Registrations
Miles, Inc.
Box 4913 Hawthorn Road
Kansas City, MO 64120-0013

Dear Mr. Thornton:

Subject: Reregistration of Fenamiphos

The Health Effects Division (HED/EPA) has reviewed the existing fenamiphos data in the light of current reregistration requirements. A brief summary of the conclusions reached follows.

The toxicological data base for fenamiphos is adequate and will support reregistration eligibility. The chemical is classified as "Group E".

The Chemistry data base for fenamiphos is adequate and will support reregistration eligibility. However the following confirmatory data are required.

a) Product Chemistry: The requirements for GDLN 62-1, preliminary analysis; and GDLN 62-2, certification of ingredient limits, have not been met for the Technical Product. The requirements for GDLN 62-3, analytical methods to verify certified limits, have not been met for either the T or FI product.

b) Residue Chemistry: The requirements for GDLN 171-4(e), Storage Stability, have not been met. However, the Miles proposal that storage stability studies with asparagus, bananas, garlic and the processed commodities of cottonseed, grapes and pineapples be used to fulfill all the outstanding commodity requirements is acceptable.

c) Rotational Crop Studies: The requirements for GDLN 165-2, limited Field Rotational Crop Studies, have not been met. Residues of concern were found on crops grown on the four-month rotation test plots. To ensure that illegal residues are not found the Agency offers two options: either amend product labels to include an eight month plantback interval or propose rotational crop tolerances for crops specified on product labels. If the latter choice is made, extensive field trials will be required.

The Occupational Hazards data base is virtually non-existent. The one study submitted "Foliar Residues Following Application of Nemacur to Pineapples" MRID# 41901701, addresses GDLN 132-1(a), foliar dissipation. The Agency reviewed this study and found it acceptable. (1)

CONCURRENCES

SYMBOL	H 7508W	7508W						
SURNAME	HORNSTEIN	Solomon						
DATE	10/4/94	2/10/95						

Although waivers had been granted, and no studies were required to address GDLNs 132-1(b), Soil Residue Dissipation; 133-3, Dermal Exposure; and 133-4 Inhalation Exposure; calculations based on available data and possible application scenarios indicate that these studies are now needed. The data requirements are as follows:

Mixer/Loader/Applicator (Handler) Exposure: Based on the results of MOE calculations data are required for three different scenarios:

- a)- Mixing/Loading with Granulars and Emulsifiable Concentrates.
- b)- Broadcast and Banding Application of Granulars.
- c)- Groundboom Application of Emulsifiable Concentrates.

The data required address GDLN 231, Estimation of Dermal Exposure at Outdoor Sites and GDLN 232, Estimation of Inhalation Exposure at Outdoor Sites.

Post-Application Exposure: Based on the use information and data available, data are required for the following three scenarios:

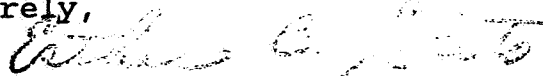
- a)- Groundboom application of Nematicur 3 on grapes, citrus, cotton, turf (except golf course turf), ornamental woody shrubs, vines and trees.
- b)- Broadcast application of Nematicur 10G and 15G on ornamental plants and turf (except golf course turf).
- c)- Banding application of Nematicur 10G and 15G on strawberries and citrus fruits.

These data address GDLN 132-1(b) Soil Residue Dissipation; GDLN 133-3, Dermal Exposure and GDLN 133-4 Inhalation Exposure.

The enclosed materials refer to the Occupational and Residential Exposure Assessment of fenamiphos and identify the Agency concerns and the existing data gaps. You have previously received the reports germane to the other topics covered in this letter.

If you require any additional information please contact Irwin Hornstein on (703) 308-8402.

Sincerely,



for Esther Saito, Acting Chief
Reregistration Branch
Special Review and
Reregistration Division

1Enclosures

(2)