

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

06/084 #34/34
2PP

SEP 14 1994



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 Environmental Fate and Effects Division (EFED/EPA) has reviewed the existing fenamiphos data in the light of current reregistration requirements. The enclosed reports provide an overall environmental assessment of the use of fenamiphos and identify Agency concerns and existing data gaps. A brief description of the conclusions reached follows.

Overall Assessment: Fenamiphos, when used either in granular form or as an emulsifiable concentrate, exceeds both the acute high risk and chronic Levels of Concern (LOCs) for terrestrial, fresh water and marine/estuarine organisms. Fenamiphos also exceeds the LOCs for ground and surface waters.

Existing data gaps: Three data gaps were identified in studies that addressed the environmental fate guidelines.

For GDLN 163-1, the unaged portion of the leaching/adsorption/desorption requirements was only partially met. Additional information concerning the origin and classification of the soils used in these studies (MRID # 40774808) is required.

For GDLN 164-1, terrestrial field dissipation, additional information regarding the study conducted with EC formulations (MRID# 42149301) is required. Also field dissipation studies using granular formulations (Nemacur 15% G) are required.

For GDLN 166-1, EFED recommends that several additional prospective ground-water monitoring studies be conducted in different use areas and under different conditions to determine when fenamiphos can be safely used. The Agency is also considering requiring a limited surface water monitoring study.

CONCURRENCES							
SYMBOL	H7508W	H7508W					
SURNAME	HORNSTEIN	Schmidt					
DATE	9/14/94	9/14/94					

Copies of the Summary report for Fenamiphos (8/19/94), the EEB Science Chapter (4/25/94) and the Fenamiphos RED Chapter (5/12/94) are enclosed. Miles should carefully consider the additional risk mitigation measures presented in these documents and request a meeting with the Agency to consider further risk reduction proposals. Questions regarding this letter should be addressed to Irwin Hornstein at (703) 308-8042.

Sincerely,

Lawrence J. Schnaubelt

Lawrence J. Schnaubelt, Section Head
Reregistration Branch, Section II
Special Review and
Reregistration Division

Enclosures: