



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

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OFFICE OF  
PESTICIDES AND TOXIC  
SUBSTANCES

**MEMORANDUM**

**SUBJECT:** EPA Reg. Nos. 239-2404 or 3125-280. **Monitor®**  
[methamidophos] residues found in rac Bok Choy grown in  
NJ. No MRID; D161630. CBRS 7695.

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**TO:** Marilyn Mautz, PM Team 16  
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On 1/2/91, FDA reported that 0.16 ppm methamidophos residues were found in fresh bok choy, a loose-headed variety of Chinese cabbage, which had been treated with a **Monitor 4** formulation, grown in NJ. Both subject products are registered for use on cabbage. No tolerance exists for methamidophos in bok choy. The labels specify use on: "CABBAGE Includes Tight Heading Varieties of Chinese Cabbage." By memorandum dated 2/14/91 to EPA, A. Evangelista [FDA] stated, "this INFERS inclusion of the loose-headed type, such as Bok-Choy". Because of this incident, FDA requests EPA: 1] Correct labeling that will prevent misuse of Monitor on bok choy; 2] Examine the feasibility of providing a tolerance for methamidophos on bok choy. We have been instructed to clarify whether the current tolerance on cabbage includes bok choy? If not, would the current residue data support such a tolerance? What additional data, if any, would be needed for such a tolerance?

The Methamidophos Registration Standard was issued 9/24/82. Several updates have issued since then; the latest on 1/30/86. Additional cabbage residue data and storage stability data are still required.

There are no tolerances pending for methamidophos on bok choy, since it is one of the loose headed varieties of Chinese cabbage. Nor is acephate registered for use on this rac. Since these insecticides are systemic, translation of residue data within the cole crop group is not appropriate. Hence, supporting

residue data from Monitor 4 treated bok choy are required for the establishment of an appropriate tolerance. Then, the labels can be amended to allow use on all types of cabbage.

Meanwhile, use of Monitor on bok choy should be discontinued because: 1] According to § 180.1(h) the commodity cabbage includes Chinese cabbage (tight headed varieties only). Since bok choy is a loose headed variety it is not covered under the methamidophos tolerance for cabbage. 2] The current [available] residue data does not support such a tolerance. and 3] The current labels do not allow use on loose headed Chinese cabbage such as bok choy.

**PM NOTE:** The subject labels should be changed to remove the suggested inference. We suggest adding the restriction, "DO NOT USE ON LOOSE HEADING VARIETIES OF CHINESE CABBAGE, SUCH AS BOK CHOY."

cc: K. Dockter (CBRS), Adverse data file, Acephate & Methamidophos Reg. Std. & Subject files, C. Furlow (PIB/FOD), Circulation (7), RF.

RDI: AARathman:3/8/91:EZager:3/11/91

H7509C:CBRS:CM#2:RM802:77886:KWDockter/Kd:3/11/91