



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

OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

SEP 23 1985

MEMORANDUM

SUBJECT: 3125-280 Methamidophos: Cauliflower and Cotton.  
Amended Registration (RCB #1248)

FROM: William L. Anthony  
RCB/HED (TS-769)

THRU: Ed Zager, Section Head  
Special Registration II  
RCB/HED (TS-769)

TO: W. Miller/M. Mautz, PM #16  
RD (TS-767)

*W. L. Anthony*

Mobay Chemical Corp., Kansas City, Mo., has submitted an amended registration request in which they propose to revise PHI's for the application of methamidophos [Monitor®-4, EPA Reg. #3125-280] to cotton and cauliflower. Monitor®-4-EC contains 4 lbs a.i. per gallon.

Permanent tolerances have been established for residues of methamidophos in/on cauliflower at 1.0 ppm, and cottonseed at 0.1 ppm(N). [40 CFR 180.315]

The registered uses are as follows:

Cotton: Not more than 1 lb a.i./A in 25 to 125 gallons water/A by ground equipment or 3 to 10 gallons water/A by aircraft. There is a 50 day PHI.

Cauli-  
flower: For preventive purposes, 0.5 lb a.i./A, repeating at 7 day intervals. For control of existing populations, 0.75 to 1.0 lb a.i./A may be applied. There is a 28 day PHI.

Note: The residue data for cauliflower do not support the established tolerance since application methods were not specified. [See "Guidance Document for Methamidophos" 5/23/85, Residue Chemistry, p. 10]

ATTACHMENT B

CERTIFICATION WITH RESPECT TO OFFER TO PAY AND GENERAL OFFER TO PAY

EPA File Symbol/Reg. No. 3125-280 Date of application 6/4/85

Name of Product MONITOR 4

Applicant's Name and Address MOBAY CHEMICAL CORPORATION  
AGRICULTURAL CHEMICALS DIVISION  
P. O. Box 4913  
Kansas City, MO 64120

I certify that, for each study listed in the list of data requirements under Section II.A. of PR Notice 84-4 that is not entitled to exclusive use protection:

1. I have obtained the written permission of the original data submitter to cite that study in support of his application; or

2. I have notified in writing by certified mail, return receipt requested, the companies who have submitted data I have cited to support this application and have offered to: (1) Pay compensation for those data in accordance with sections 3(c)(1)(D) and 3(c)(2)(D) of the Federal Insecticide, Fungicide and Rodenticide Act; and (2) Commence negotiations to determine which data are subject to the compensation requirement of FIFRA, and the amount and terms of compensation due, if any.

The companies I have notified are: (Check one)

☒ All companies listed on the Pesticide Data Submitters List for all active ingredients contained in my product (Cite-All method).

☐ Those companies who have submitted the studies which I have cited (Selective method).

I hereby offer and agree to pay compensation to other parties, with regard to the approval of this application, to the extent required by section 3(c)(1)(D) and section 3(c)(2)(D) of the Federal Insecticide, Fungicide and Rodenticide Act, as amended.

Signature: 

Title: Manager, Registrations

Date: June 4, 1985

The amended registration would modify the registered uses as follows:

Cotton: Revise PHI from 50 days to "do not apply after 65% of the bolls open."

Cauliflower: Reduce PHI to 14 days.

#### Our Comments

According to RCB's Agricultural Practices files, the stage of growth at which 65% of bolls are open is 21 days or less before harvest. No data reflecting this short PHI are available. According to the reregistration "Guidance Document for Methamidophos" (5/23/85), the residue data for cauliflower do not support the established tolerance since the application methods were not specified.

#### Conclusions

1. In the absence of residue data reflecting the proposed shortened PHI (approximately 21 days) for cotton, we cannot determine whether the established 0.1 ppm tolerance for residues of methamidophos in/on cottonseed would be exceeded as a result of the proposed use.
2. The established tolerance for residues of methamidophos in/on cauliflower is not supported by the available residue data according to "Guidance Document for Methamidophos." (5/23/85)

#### Recommendation

For reasons listed in conclusions 1 and 2, we recommend against this amended registration.

cc: Circu, Reviewer, RF, Methamidophos SF, PMSD/ISB  
RDI:E.Zager,9/23/85;RDS:D.Schmitt,9/23/85  
TS-769,RCB:CM#2;RM812C;557-7484;W.Anthony;lr;9/23/85