



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

AUG 30 1985

MEMORANDUM

OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

SUBJECT: EPA Reg No 3125-280. Methamidophos on Lettuce.  
No Accession Number. RCB No 1249.

FROM: Leung Cheng, Chemist *L. Cheng*  
Residue Chemistry Branch  
Hazard Evaluation Division (TS-769)

THRU: Andrew R. Rathman, Section Head *ARR*  
Residue Chemistry Branch  
Hazard Evaluation Division (TS-769)

TO: William Miller, PM #16  
Insecticide-Rodenticide Branch  
Registration Division (TS-767)

Mobay has requested to add the use on lettuce to its Monitor® 4 (EPA Reg No 3125-280) label. This insecticide contains methamidophos (O,S-dimethyl phosphoramidothioate) as the active ingredient. A prior request in 1983 was rejected due to incomplete data. Mobay stated in its letter of 6/4/85 that EPA has been authorized by Chevron to use Chevron's newly submitted data in support of Mobay's current request.

A tolerance of 1 ppm is established for the residues of methamidophos on lettuce [40CFR§180.315].

Mobay's Monitor® 4 contains the same amount (40% by weight) of the active ingredient as Chevron's Monitor 4 Spray (EPA Reg No 239-2404). Mobay's label describes identical use pattern to that of Chevron's product (N. Dodd, 12/2/83, EPA Reg No 2392404). Monitor® 4 is to be applied by aerial or ground equipment to head lettuce (crisphead type only) in CA and AZ only at the rate of 1-2 pints (0.5-1 lb ai) per acre. A maximum of 3 lbs per acre per season is allowed. A PHI of 35 days is imposed on use in Central California and corresponding coastal areas. For use in desert valley areas of California and Arizona, use is restricted to no later than 50 days before first harvest and the last application must be made prior to head formation. There is also a feeding restriction of treated lettuce to livestock.

Chevron requested in 1983 to include use of Monitor 4 Spray on lettuce. Chevron's initial studies (conducted in CA and FL, submitted in 1972) showed <0.01-0.03 ppm methamidophos residues after 3-4 aerial applications of 1 lb ai/A and PHI's of 21-51 days. Subsequent residue data, however, showed considerably higher

values and several >1 ppm values were found resulting from proposed use. We questioned whether this discrepancy was due to trimmed versus untrimmed lettuce heads. As a result, we required additional residue data on whole, untrimmed lettuce reflecting proposed use. Chevron was also requested to specify which locations in CA and AZ represent desert valley areas or not desert valley areas, and those which represent central and coastal areas of California. Since the tolerance for the combined residues of acephate [O,S-di-methyl acetylphosphoroamidothioate] on lettuce is 10 ppm of which no more than 1 ppm is methamidophos, the label should also restrict use of both acephate and methamidophos on lettuce (N. Dodd, above cited memo).

Thus, Chevron's request was denied by RCB. To date, our files indicate no additional lettuce data submitted by Chevron.

We likewise recommend against Mobay's request.

#### Conclusions and Recommendation

1. Our files show no new lettuce residue data from Chevron as suggested by Mobay.

2. Mobay's current request is identical to the one previously submitted in 1983 by Chevron, which was denied by RCB (EPA Reg No 239-2404, N. Dodd, 12/2/83).

We recommend against Mobay's request.

cc:Circ, SF, RF, Methamidophos Amended Use F, Cheng, PMSD/ISB  
RDI:ARRathman:8/30/85:RDSchmitt:8/30 85  
TS-769:LCheng:CM#2:RM810:Date:8/30/85:557-7484