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

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APR 29 1988

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

Memorandum:

SUBJECT: 100-545. Phosphamidon Registration Standard Data
Call In. Comments On Extensions of Due Dates (RCB
#3652, no MRID or Acc #'s)

FROM: Jerry B. Stokes, Chemist
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Jerry B. Stokes

THRU: Philip V. Errico, Section Head III
Residue Chemistry Branch
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Philip V. Errico

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

and

Toxicology Branch
Hazard Evaluation Division (TS-769C)

In response to the Agency's data call in dated January 19, 1988 for the Phosphamidon Registration Standard, CIBA-GEIGY has submitted a cover letter dated March 17, 1988 (See letter of J. Harrison, CIBA-GEIGY Regulatory Specialist, Phosphamidon Reg. Std. file). The registrant has requested extensions of data due dates and expressed intent to support uses of the insecticide phosphamidon (2-chloro-2-diethylcarbamoyl-1-methylvinyl dimethyl phosphate) only for cotton, potatoes, walnuts, and apples. Tolerances are established for apples, citrus fruits, broccoli, cauliflower, cucumbers, peppers, cantaloupes, watermelons, cottonseed, potatoes, sugarcane, tomatoes, and walnuts under §40 CFR 180.239. CIBA-GEIGY will confirm which uses they will support in an official response to the standard by April 26, 1988. If CIBA-GEIGY is not the original petitioner for the uses they do not want to support, then the original petitioners should be notified and asked if they wish to supply the necessary data to maintain the registration. Otherwise, all tolerances should be revoked for those uses with no data support.

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[Signature]

Conclusions/Recommendations:

1a. Granting of extensions is an RD administrative decision. RCB has no objections if RD grants the requested extensions for data requirements per Phosphamidon Registration Standard data call in (dated 1/19/88) as noted under conclusion 1b.

1b. The following extension requests are supportable under PR Notice 85.5 due to sequential data requirements.

- (1) EPA submission date of 7/89 for plant metabolic studies extended to 9/89.
- (2) EPA submission date of 4/89 for analytical methodology, plant residues, extended to 1/90.
- (3) EPA submission date of 7/89 for storage stability studies extended to 1/91.
- (5) EPA submission date of 7/89 for plant residue studies extended to 7/90.
- (6) EPA submission dates of 1/90 for all processing studies extended to 7/90.

2a. CIBA-GEIGY will meet the submission date of 7/89 for animal metabolic studies. No extension is requested.

2b. CIBA-GEIGY also does not request time extensions for

- (1) analytical methodology (animal residues), and
- (2) residues in meat, milk, poultry, and eggs.

(Agency data requirements are reserved in the standard and will depend upon results of the animal metabolic studies.)

Detailed Considerations:

See Table 1 for due dates of data requirements per request the Phosphamidon Registration Standard data call in (dated 1/17/88), for CIBA-GEIGY's requests for extensions of due dates, and for RCB's comments on such extensions.

Table 1

Study	EPA Due Date 1	C-G Proposed Date 2	Recommended EPA Due Date
Plant metabolism	7/89	9/89 (2 month extension)	9/89
Livestock metabolism	7/89	7/89	7/89
Analytical methodology: plants	4/89	1/90 (9 month extension)	1/90
Analytical methodology: animals	Reserved 4	----	----
Storage stability	7/89	1/91 (17 month extension)	1/91
Magnitude of the residue: crops	7/89	7/90 (12 month extension)	7/90
Magnitude of the residue: processed commodities	1/90	7/90 (6 month extension)	7/90
Magnitude of the residue: meat, milk, poultry, and eggs	Reserved 4	----	----

- 1 Per request of Phosphamidon Registration Standard data call in (dated 1/17/88).
- 2 CIBA-GEIGY's data extension requests per letter of 3/17/88 (See letter for details).
- 3 Sequential data requirements are involved, therefore RCB has no objections if RD grants the requested extensions. The recommended "revised" EPA submission dates are listed.
- 4 Agency data requirements will depend upon the results of the animal metabolic studies.

cc: R.F.; Circu; S.F.; PMSD/ISB; J. Stokes; Phosphamidon Reg. Std.
 RDI: Ferrico:4/28/88:RSchmitt:4/28/88
 TS-769:RCB:JStokes:js:Rm 805:CM#2:4/29/88