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October 2, 1998

MEMORANDUM

SUBJECT: Valent's Comments Pertaining to Water and Fate Issues in the Naled: Draft Environmental Fate and Ecological Effects Chapter, November 14, 1997 (RED)
DP Barcode : D249309

FROM: Jon Peckenpaugh,
Silvia Termes, and
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Through: Elizabeth Behl, Branch Chief
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To: Kathy Monk, Chief Reregistration Branch II and
Diane Isbell, PM Team Reviewer
Special Review and Reregistration Division (7508W)

On August 10, 1998 OPP placed the Environmental Fate and Ecological Effects Assessment of Naled (draft 1995) onto the US EPA's website (http://www.epa.gov/oppsrrd1/op/group1.htm). At that time, the Agency requested comments on assessments for nine organophosphate pesticides, one of which was naled.. Public comments are to be submitted to the Agency by October 13, 1998. This memorandum addresses comments made by Valent on the draft Environmental Fate and Ecological Effects chapter for naled (dated 11/14/97) submitted to the Agency on August 26, 1998.

Valent has correctly stated that the GENEEC runs for DDVP are incorrect. The difference in molecular weight between the naled and DDVP should have considered in determining the rate of DDVP applied. Therefore, the applied rate of DDVP should have been multiplied by a factor of 0.58, the ratio of the molecular weights of DDVP and naled.

Valent's remaining comments are substantive and will not be addressed at this time. All of these comments will be addressed in the revision of EFED's RED chapter.