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

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OCT 29 1987

OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Parathion (057501)  
Response to Cheminova Letter of 3/27/87  
Request for Time Extension for Residue Data  
[No MRID No., RCB No. 2796]

FROM: Susan V. Hummel, Chemist  
Special Registration Section II  
Residue Chemistry Branch  
Hazard Evaluation Division (TS-769C)

*Susan V. Hummel*

THRU: Edward Zager, Section Head  
Special Registration Section II  
Residue Chemistry Branch  
Hazard Evaluation Division (TS-769C)

*Edward Zager*

TO: Donna Kostka  
Special Review Branch  
Registration Division (TS-767)

Special Review Branch has requested RCB to prepare a response to Cheminova's letter of 3/27/87, requesting time extensions for residue data.

Cheminova proposes to submit preliminary and final reports as follows. Preliminary metabolism reports will contain the distribution of residues only, no metabolite identification. Final residue reports will contain analyses for parathion and paraoxon only. Amended final residue reports will contain metabolite identification, and residue analyses for additional metabolites, if necessary.

Plant Metabolism

Preliminary Report - Potatoes	11/15/87
Preliminary Report - Wheat	11/30/87
Preliminary Report - Cotton	12/31/87
Final Reports - Potatoes, wheat, cotton	03/31/88

Animal Metabolism

Preliminary Report	07/28/87
Final Report	12/31/87

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Magnitude of the Residue

Final reports (including analysis for parathion and paraoxon only)	9/87 to 5/88 (6 months later for processed commodities)
Amended final residue reports	9/88

RCB COMMENT

The original due dates (July, 1987) for the plant and animal metabolism studies allowed 18 months for completion, consistent with PR Notice 85-5. Consequently, any further time extension is not scientifically supportable. However, the setting of due dates is an administrative decision of the Registration Division.

Time extensions were granted in the EPA letter of 10/31/86, based on RCB review of 6/3/86 (S. Hummel). The due dates for residue studies were set to be consistent with the time needed to grow and treat the crops for the field trials. The time allowed was at least six months from the time of harvest, allowing time to plan and initiate the residue field trials. Several crops were inadvertently omitted from the letter granting time extensions. Due dates for these crops are:

<u>Crop</u>	<u>Due date</u>
alfalfa	1/88
cotton	1/88
tree nuts	5/88

Since the plant metabolism studies were to be completed by 7/87, and the first magnitude of the residue reports was due 9/87, sufficient time was available to know the results of the plant metabolism study and use that information for the analysis of residue samples. Consequently, time extensions for the full magnitude of the residue reports are not scientifically supportable. However, time extensions are administrative decisions of the Registration Division. RCB would not object to the granting of any time extensions.

Note: The most likely residues of concern are parathion and paraoxon, those proposed to be included in the residue reports by the extended due dates.

cc:R.F., Circu, S. Hummel, Parathion S.F., Parathion S.R.F. (Hummel), Parathion R.S.F. (Boodee), D. Edwards (PM#12/RD), TOX (Zendzian)

RDI:EZ:10/28/87:RDS:10/28/87

TS-769:RCB:SVH:svh:RM:810:CM#2:10/29/87

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