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

FEB 23 1990

MEMORANDUM

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

SUBJECT: A/S Cheminova: Response to the Ethyl Parathion
Standard: Residue Chemistry Data No (RID #, DEB # 6331)

FROM: R. B. Perfetti, Ph.D., Chemist
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R B Perfetti

THRU: Richard D. Schmitt, Ph.D., Chief
Dietary Exposure Branch
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Richard D Schmitt

TO: Reto Engler, Ph.D., Chief
Science Analysis and Coordination Branch
Health Effects Division (H7509C)

and

J. Talarico, RM-74
Reregistration Branch
Special Review and Reregistration Division (H7508C)

Jellinek et. al. Inc., on behalf of A/S Cheminova has submitted a letter dated 1/19/90 in which they have asked for clarification of several points regarding the magnitude of the residue in meat, milk, poultry and eggs. These questions and our responses are discussed below.

1) The Registrant has posed a question regarding combining parent compound and metabolites in a single feeding study. We have however been informed by J. Talarico (oral communication) that the Registrant no longer has any questions regarding this topic.

2) The Registrant requests that the Agency approve the feeding of ethyl parathion, paraoxon and p-nitrophenol in a magnitude of the residue in meat, milk, poultry and eggs feeding study.

3/2/90

DEB' Comment

The Registrant should be made aware of the fact that, if the metabolism of ethyl parathion is similar in plants and animals, then a magnitude of the residue feeding study can be performed using parent compound only. The metabolites of concern observed in the metabolism study should be quantitated for the feeding study.

A final determination of whether the metabolic pathways for ethyl parathion are similar in plants and animals cannot be made until such time as all of the required metabolism studies are submitted and reviewed.

3) The Registrant requests that the Agency approve certain dose levels to be used in their feeding studies.

DEB's Comment

The three dose levels of 20,60 and 200 ppm for ruminants and 3, 9 and 30 ppm for poultry are acceptable. As per our comments above however, they should be levels of ethyl parathion per se unless the metabolism of this compound is different in plants and animals.

Analyses should determine all metabolites of concern as observed in the metabolism studies.

cc: TOX, J. Burrell (FOD), Ethyl Parathion Reregistration Standard File, Ethyl Parathion Subject File, M. Hawkins (HED), P. Fenner-Crisp (HED), Circ (7)

DEB:H7509C:Rm810:X7484:R.Perfetti:vg:2/23/90

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