

US EPA ARCHIVE DOCUMENT

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Shaughnessy No.: 058001  
AUG - 6 1987  
Date Out of EAB: \_\_\_\_\_

To: D. Edwards/ Jenkins  
Product Manager # 12  
Registration Division (TS-767)

From: Therese M. Dougherty, Chief  
Environmental Chemistry Review Section 1  
Exposure Assessment Branch  
Hazard Evaluation Division (TS-769-C)

Attached, please find the EAB review of...

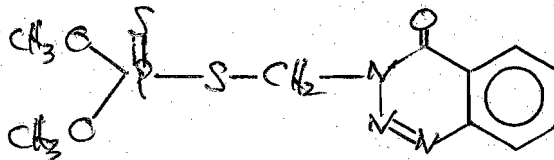
Reg./File # : 3125-193  
Chemical Name: Azinphos methyl  
Type Product : Insecticide  
Product Name : Action relates to all products with azinphos methyl  
Company Name : Mobay Chemical Corp  
Purpose : Review mesocosm test protocol as required by registration standard.

Action Code: 352 EAB #(s): 70577  
Date Received: 5/8/87 TAIS Code: ---  
Date Completed: AUG - 6 1987 Total Reviewing Time: 0.5 day  
Monitoring study requested: \_\_\_\_\_  
Monitoring study voluntarily: \_\_\_\_\_

Deferrals to:  Ecological Effects Branch  
 Residue Chemistry Branch  
 Toxicology Branch



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1. CHEMICAL:Common Name- azinphos-methyl (Guthion)Chemical Name- O,O-dimethyl-S-[4-oxo-1,2,3-benzotriazin-3(4H)-ylmethyl] phosphorodithioateTrade Name- Not applicable.Chemical Structure-2. TEST MATERIAL: Not applicable.3. STUDY/ACTION TYPE: Mobay Chemical Corp. is submitting a Study Plan and Test Protocol in response to the azinphos methyl registration standard (issued 9/11/86) requirement for a "Simulated or Actual Field Testing for Aquatic Organisms (§ 72-7)."4. STUDY IDENTIFICATION: Mesocosm Test for Environmental Fate and Ecological Effects of Guthion, March 1987.5. REVIEWED BY:Herbert L. Manning, Ph.D.  
Microbiologist  
EAB/HEDSignature: *Herbert L. Manning*  
Date:

AUG - 6 1987

6. APPROVED BY:Therese M. Dougherty, Chief  
Section 1  
EAB/HEDSignature: *Therese M. Dougherty*  
Date:

AUG - 6 1987

7. CONCLUSION:

See RECOMMENDATION.

8. RECOMMENDATION:EAB is returning this protocol to RD without reviewing it, because it is a study that the Ecological Effects Branch reviews and it should not be sent to EAB.  
*Chase*

9. BACKGROUND:

A. Introduction

See Secion 3 of this review.

B. Directions for Use

Not applicable.

10. DISCUSSION OF INDIVIDUAL STUDIES:

Not applicable. No study appropriate to EAB was submitted.

11. COMPLETION OF ONE-LINER:

Not applicable.

12. CBI:

None submitted.

# Mobay



Mobay Corporation  
A Bayer USA INC. Company

CERTIFIED MAIL 584 709 469

Agricultural Chemicals Division

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Product Manager (12)  
Environmental Protection Agency  
Registration Division (TS-767C)  
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April 28, 1987

Subject: Reregistration of Pesticide Products  
Containing Azinphos-Methyl

Dear Mr. Edwards:

In the guidance document (issued 9/11/86) for the subject reregistration, there is a requirement for "Simulated or Actual Field Testing for Aquatic Organisms (No. 72-7)." Enclosed for the Agency's review are two copies of Mobay's protocol for satisfying this requirement. The protocol is entitled "STUDY PLAN AND TEST PROTOCOL: Mesocosm Test for Environmental Fate and Ecological Effects of GUTHION."

Please note, Mobay is proposing to do a mesocosm study based on guidance from the Agency. The azinphos-methyl guidance document (Footnote No. 9, page 116) states: "However, a mesocosm study, using both fish and aquatic invertebrates, is likely to be more applicable to (all) registered sites."

In addition, Mobay recently received an Agency review of a protocol for an aquatic field study with reference to Mobay's pending registration of BAYTHROID 2 for use on cotton, EPA File Symbol 3125-GLR. Briefly, the Agency rejected the field study protocol and indicated a mesocosm study would be preferable.

If the Agency agrees with our proposed mesocosm size, type and location (Stanley, Kansas), then (weather permitting) Mobay will start construction of the ponds. Please note, after the construction of the ponds and introduction (at various stages) of all the aquatic organisms, our protocol calls for a one year equilibration of the ponds before treatment. This period is identical to the equalibration period recommended in the Agency's 1/22/87 Draft Guidelines for Aquatic Mesocosm Tests To Support Pesticide Registrations.

After equilibration of the ponds, treatment will be conducted in the spring and summer (normal application times) and post treatment sampling and analysis will continue through the remainder of the treatment calendar year. Report preparation should be complete in spring of the calendar year following treatment year.

We trust that the due date for the completed report will reflect these time frames once the ponds are constructed.

If you have any questions regarding this matter, please advise.

Yours very truly,

MOBAY CORPORATION  
AGRICULTURAL CHEMICALS DIVISION

*John S. Thornton*  
John S. Thornton, Manager  
Registrations  
Research and Development

JST:FTM:brh

Enclosures: Protocol (2 copies)

cc: Laboratory Data Integrity Program  
Office of Compliance Monitoring (EN-342)