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

SEP 1 5 1988

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT:

Azinphos-methyl (Guthion®; EPA Reg. No. 3125-108)

amendment to reduce the PHI for almonds.

No MRID No. Branch No. 4328.

FROM:

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THRU:

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TO:

Dennis H. Edwards, Jr./Portia M. Jenkins, PM#12

Registration Division (TS-767)

Data, "submitted in 1987", by Mobay Chemical Corporation at the request of the state of California for our review is claimed by that State to support a 28-day PHI for Guthion on almonds. At the Agency's request, CA-820045 had been withdrawn for potential tolerance exceeding residues on almond hulls. Hence, this current request now constitutes a proposed amendment to the registration of Mobay's product, EPA Reg. No. 3125-108, to revise its use pattern on almonds.

This is the fifth submission proposing this revision.

The Azinphos-Methyl (Guthion) Registration Standard Product and Residue Chemistry Chapters were transmitted on 4/4/86.

Tolerances for the active ingredient azinphos-methyl [0,0]-dimethyl S-[(4-oxo-1,2,3]-bensotriazin-3(4H)-yl)methyl] phosphorodithioate] exist at 0.3 on almonds and at 10.0 on almond hulls (40 CFR 180.154). A tolerance of 0.04 (N) ppm exists in milk (180.154a).

The currently registered use permits two applications, 30 days apart, at the rate of 0.375-0.5 lb ai/100 gallons with a maximum of 500 gallons of spray per acre. A 60-day PHI is in effect. Grazing is not permitted for 21 days after treatment.

The proposed amendment would reduce the PHI to 28 days.

The "1987-submitted" data-package, 24 studies, is a <u>re</u>submission the 1981 data-package.

We reiterate (from memoranda: E. Zager-2/12/82, L. Propst-11/3/82, W. Anthony-7/9/86, and W. Anthony-8/19/87) that these 1981(7) data cannot counter the available data showing residues exceeding the tolerance at PHIs less than 60 days.

Therefore, we continue to recommend against a 28-day PHI.