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*draft w/submit*

OFFICE OF  
PESTICIDES AND TOXIC  
SUBSTANCES

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MEMORANDUM

SUBJECT: EFED's Comments on Proposed DCI for Guthion

FROM: Jean Holmes *Jean Holmes*  
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TO: Larry Schnaubelt/ Robert Richards  
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Special Review and Reregistration Division (H7508C)

Upon review of the draft DCI for Guthion, EFED has found a few concerns that need to be addressed. The concerns are as follows:

(1) It might be better to have the following explanation in the 71-5 (b) DCI.

"At a minimum, the Terrestrial Field Studies need to be conducted on each of the major azimphos-methyl crops sites such as cotton, almonds, and walnuts. The registrant should submit a protocol to the Agency for review before the studies are conducted. These studies are required for the following reasons:

- Treatment related mortality to birds, mammals, and reptiles was documented in the 71-5 (b) Terrestrial field study conducted on apples. Since these data do not refute the presumption of hazard, additional studies conducted on the other crops are needed.

- Laboratory avian reproduction data indicate that the No Observable Effect Level was 10.5 ppm."

(2) Include the recommendations, regarding the Leaching/ Adsorption/Desorption study (165-1), attached to the draft DCI.

3) EFGW is not requesting additional studies other than what is indicated in the Draft DCI, but there is concern about the lack of information on the formation/fate/transport of the chemical species containing the organophosphate moiety formed by cleavage of the -P-S- or -S-C- bond in the -P-S-C- bridge of the azinphosmethyl molecule. Therefore, the registrant must address this concern by giving information on the degradates containing solely an organophosphate moiety in the Hydrolysis, Photodegradation in Water and on Soil, Aerobic/ Anaerobic Soil Metabolism and Leaching/Adsorption/Desorption studies.

cc: Anne Barton

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