UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

MEMORANDUM

SUBJECT: Azinphos-methyl
Response to Miles Agricultural Division's Waiver Request
for Accumulation in Irrigated Crops (163-3)

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THRU: Akiva D. Abramovitch, Ph.D., Section Head
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The Branch recommends RESERVING the Accumulation in Irrigated Crops (165-3)
data requirement rather than granting a waiver at the present time. To date,
the fate of the organophosphate moiety in the environment has not been
established. Once data on the fate of the organophosphate moiety are
available, the Branch will reconsider the waiver request. Depending on the
data, the 165-3 requirement may be waived, imposed or appropriate
label restrictions recommended.

BACKGROUND

a. From available environmental fate data there is evidence that degradates
   containing solely the organophosphate moiety may form in the environment
   and/or be uptaken by crops. However, the fate of the organophosphate
   moiety has not previously been addressed. The Branch has requested the
   registrant to address this issue (EFGWB #91-0915, 1/2/92; DCI, EFGWB #92-0550,
   3/23/92).

b. The Branch also considers prudent to reserve this data requirement in view
   of the ecological and health concerns currently identified with this
   chemical. Although azinphos-methyl has a short hydrolytic half-life and
   it is only registered for terrestrial uses, the ecological incidents
   attributed to its presence in surface waters as a result of run-off.

cc: Branch Files
    Azinphos-methyl File