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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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MEMORANDUM:

SUBJECT: Azinphos-methyl: Revision of Draft EFED Reregistration Eligibility Decision (RED) Science Chapter to Include Registrant's Comments

FROM: Jean Holmes, Biologists (Team Leader) Jean Holmes 1/7/99
Dave Jones, Agronomist (Fate and Water Resource Assessment)
William Erickson, Biologist (Terrestrial Assessment)
Andy Bryceland, Biologist (Aquatic Assessment)
Environmental Fate and Effects Division (7507C)

THRU: Betsy Grim, Chief (Acting) BGrim 1-7-99
ERBII/EFED (7507C)

TO: Barry O"Keefe,
Reregistration Branch 2
Special Review and Reregistration Division (7508C)

Attached please find a revised EFED Reregistration Eligibility Decision (RED) science chapter for azinphos methyl which includes corrections to errors identified by the registrant BAYER in their letter, " "Response to the Draft EFED Reregistraion Eligibility Decision (RED) Science Chapter for Azinphos-methyl, List A Case 0235".

The following changes identified by the registrant have been incorporated into the EFED science chapter:

o The typographical error on page 43 has been corrected from brown trout to brook trout.

o The common taxonomic usage of the test species for the studies (MRID # 41202002 and 4038052) will be corrected from *Americamysis bahia* or opossum shrimp to *Mysidopsis bahia* or mysid shrimp.

o The reformatting error in the maximum EEC, average maximum EEC and the Risk

quotients (RQ) for birds and mammals have been corrected.

o All references to "Bayer Inc.'s" will be replaced with "Bayer Corporation's".

o The inclusion of the table on pages 145 to 147 was in error; therefore, it has been deleted.

o A brief description of the averaging period used to generate the average EEC's for the chronic risk to birds and mammals was added..

o In the surface water assessment, an explanation of how the aerobic aquatic degradation rate was derived has been added. It is 3 times the aerobic soil metabolism input value in PRIZM.

The following issues raised by the registrant are addressed below but do not require a revision to the EFED science chapter.

o An aerobic aquatic study (MRID 4411801), identified by the registrant, which is not included in the document. This study was reviewed by EFED and found to be invalid; therefore, it was not incorporated into EFED's assessment of azinphos methyl. The completed DER will be sent shortly.

o A mesocosm study (MRID 41549401), identified by the registrant, which is not included in the document. This study was reviewed by EFED and found to be invalid; therefore, it was not incorporated into EFED's assessment of azinphos methyl.

o In the surface water assessment, a value of 1.02x10-4 h-1 was used for the aerobic aquatic degradation rate. The correct value should be 1.51x10-4 h-1. However, since the hydrolysis rate was considered in the assessment, the corrected value of 1.51x10-4 h-1 does not make a significant effect on the results of the surface water assessment.

The following issues raised by the registrant will be addressed during the 60 day comment period:

o Comments regarding the use of a monitoring study to establish the acute ground water exposure concentration.

o The supplemental status of the Deer Mouse (MRID No. 408583-01) study.

o EFED's interpretation of the terrestrial field and pen tests.

o A rainbow trout study (MRID No. 158231), identified by the registrant, which is not included in the EFED chapter.

o A difference in NOEC for the Bobwhite reproduction study. This was not used in the risk assessment.

o The method used to derive the average EECs in the assessment of chronic risk to birds and mammals.

o The foliar half-live in supplemental studies conducted in Georgia and Mississippi.

o The registrants interpretation of the field dissipation studies in Georgia and Mississippi.

Attachments