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

OCT 23 1986

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OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: List of Pesticides for Which IR-4 Needs Residue
Chemical Information Before the Commencing of
Tolerance Petition Actions (Per Drew Baker Letter
Request of July 24, 1986) RCB No. 1295

FROM: V. Frank Boyd, Ph.D., Chemist
Residue Chemistry Branch
Hazard Evaluation Division (TS-769C)

THRU: Charles L. Trichilo, Ph.D., Chief
Tolerance Petition Section II
Residue Chemistry Branch
Hazard Evaluation Division (TS-769C)

TO: Hoyt L. Jamerson
Minor Uses Officer
Registration Division (TS-767C)

The letter request of July 24, 1986 (see attachment) is seeking information from HED in all technical areas and from RD in administrative areas predicting the regulatory status of 92 pesticides between now and not to exceed the year of 1989. Accordingly, RCB supplied information on residue tolerance potentials by participating in a telephone conference with IR-4 on August 26, 1984. That conference with five participants (F. Boyd, RCB, Hoyt Jamerson and E. Asbury, RD; with D. Baker and R. Guest of IR-4 Headquarters in New Jersey) allowed expeditious transmittal of brief assessments on each of the 92 chemicals, as requested by IR-4 in aforementioned correspondence.

In an effort to initiate a written record of such status reports, as periodically requested by IR-4, a one-liner type summary is given for each of the 92 pesticides below. The list of pesticides is divided into the following three groups:

1. Pesticides with no foreseen RCB problems;
2. Pesticides with known RCB problems that may be resolved by 1989; and

3. Pesticides with known RCB problems that may not be resolved by 1989.

Since the Residue Chemistry Chapter of the Reregistration Standards identifying many of the data gap deficiencies must be considered in formulating the preceding groups, those pesticides whose Standards are already completed by RCB are denoted with two asterisks (**) and those whose Standards are scheduled for 1987 are denoted with one asterisk (*).

Status of Researchable Pesticides

Group I. Pesticides With No Foreseen "RCB Problems"

RCB advises IR-4 to read the completed RCB Chapters of the various Registration Standards denoted below:

1. Amdro-Tolerances have been set and proposed at 0.05 ppm on some raw agricultural commodities (RCB) (see Pesticide Chemical New Guide)
2. Asulam*
3. Benomyl - New tolerances on "minor crops" seem to be feasible
4. Cyhexatin - New "Minor Uses" may be successful
5. Diazinon*
6. Diuron**
7. Bentazon**
8. Diflubenzuron**
9. Malathion*
10. Metalaxyl**
11. Methyl bromide
12. Metalachlor
13. Naptalam**
14. Oxamyl*
15. Sethoxydim
16. Terbufos

17. Thiobencarb
18. Triallate
19. Gibberellic acid
20. Ethephon
21. Fensulfothion**
22. Fenthion*
23. Methidathion**
24. Fenamiphos*
25. Etridiazole - mix of terrazole and thiophanate
26. Thiophanate-methyl** - same as for benomyl
27. Sodium chlorate
28. Sodium fluoaluminate
29. Phosmet**
30. NAA

Group II. Pesticides With Known RCB Problems that may be Resolved by 1989

31. Acephate** - Need to utilize M-12A Method for metabolites not used for generating previous residue data
32. Methamidophos** - Metabolite of acephate (see above)
33. Aldicarb** - Need ruminant metabolism and processing data
34. Chlorothalonil** - Need plant and animal metabolism; analyze for HCB and PCBN
35. Chlorpyrifos** - Metabolism needed in corn, root crop, and animals
36. DCNA - Data on totaling pre-harvest and post-harvest residues needed.
37. Diclofop-methyl - Animal metabolism needed

38. Diethatyl-ethyl - Meat, milk, poultry analytical methodology is needed
39. Dimethoate** - RCB data are old and unreliable there are no minor uses at present
40. Diquat - Crop residue data are needed - more data will be required
41. Ametryn - Manufacturer is performing new metabolism, methodology and processing studies - opinions will depend on review of data to be submitted
42. Prometryn* - Same as #41
43. Propargite - Same as #41
44. Ethoprop** - Metabolism in plants; residues in potatoes and tobacco may be submitted by 1987
45. Acifluorfen - Limited residue data are available; single soybean action and NDR level has been considered
46. Fluazifop-p-butyl - Plant metabolism is inadequate
47. Linuron** - Residue data are old - need new residue data on all crops; NDR only on minor crops
48. Zinc phosphide** - Need resolution of Product Chemistry and impact on livestock
49. Maneb - ETU data sufficient for Risk/Benefit; low residues - minor crops
- Group III. Pesticide With Known RCB Problems that may not be Resolved by 1989
50. Amitraz** - Need plant metabolism; no feed crop tolerances
51. Azinphos-methyl**
52. B T. Israelensis - Exempted for use on mosquitoes; no RAC
53. Bensulide - Ornamentals and turf uses only
54. Captafol** - Plant metabolism needed for pre- and postharvest use - Compounds under special review
55. Captan - Same as #54

56. Carbofuran** - Registration Standard gaps are to be completed in 1988; phenolic residues are needed
57. Dalapon* - All data are old; lots of RAC's
58. DCPA* - Discontinued by manufacturer
59. Dicofol** - No addition of DDT to environment allowed
60. 2,4-DB - Plant and animal metabolism are needed
61. 4-CPA - Same as #60
62. Dimethazone - Experimental, only, in crops as of present
63. Dinoseb** - No!
64. Disulfaton** - All data are needed, including plant and animal metabolism
65. Endosulfan** - Current data on alfalfa including method are unacceptable
66. Ethion** - Plant metabolism is unknown
67. Fonofos** - Animal feeding and residue data are needed
68. Formetanate hydrochloride - Structurally and toxicologically involved in restricted use of chlordimeform
69. Mancozeb - Risk/Benefit review is expected to limit use
70. Methiocarb - Analytical method problems precipitated by registrant
71. Methomyl** - Acetamide as metabolite in plants and animals must be cleared up
72. Thiodicarb** - Same as #71
73. Mevinphos - All data are old; have no good residue data
74. Napropamide - Metabolism and residue data are needed
75. Molinate - Registered for used with propanil, only

76. Propanil* - 3,4-dichloroproprianilid is still a metabolite problem
77. Nitrapyrin** - Plant metabolism (corn) is needed
78. Paraquat** - Good residue data are needed (could be moved to Group II above)
79. PCNB - Method must be for PCA, MPCPS, PCB, and HCB
80. Pendimethalin** - Need all data - should be nearing completion
81. Parathion - Most residue data are old - must now separate methyl from ethyl parathion for tolerance
82. Oxydemetonmethyl - See disulfaton above
83. Oxyfluorfen - Metabolism needed if proposed tolerances are finite
84. Pronamide - Good residue data are required (could be moved to Group I above)
85. Propachlor** - Needs everything!
86. Propargite** - Metabolism may be needed due to limited RAC's
87. Pyrazon - Sugarbeet herbicide, only-have no other residue or metabolism data
88. Simazine** - Animal metabolism and feeding studies should be completed in 1989
89. Streptomycin - Methodology and residue data are old
90. Terbutryn** - Incomplete and old data for metabolism; have residue data in barley only
91. Triphenyltin hydroxide** - NDR tolerances only compound is in Special Review
92. Ziram - No RCB data submitted since 1955

In many of the above comments the age of data is mentioned. In keeping with an OPP trend to update all analytical data to the state-of-the-art, data age is an important point for IR-4 to discuss with manufacturer when scheduling residue analysis of field samples by appropriate method.

Recommendations

RCB recommends that IR-4 use the above information as a guide only. Although we have gone to great length in researching the above 92 compounds, continuous incoming information may change our thoughts on these compounds within weeks, i.e., RCB cannot be held responsible for any project that may prove to be fatal before, during, and after completion. For example, you have submitted PP#6E3427-Methiocarb on raspberries. Recently, analytical methods problems were precipitated by the registrant which postponed approval of tolerances.

Attachment

cc: R.F. Circu, V.F.Boyd, M. Kovacs, Minor Use File, Reading File
TS-769:RCB:Reviewer:F.Boyd:Edited vg:CM#2:Rm804:557-7324:10/16/86
RDI: J.H.Onley:9/25/86:R.D.Schmitt

87556:Boyd:C.Disk:KENCO:9/29/86:EK

ATTACHMENT



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

Boyd

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

July 24, 1986

Mr. Hoyt L. Jamerson
Minor Uses Officer
Emergency Response & Minor Use Section
Registration Support and Emergency
Response Branch
Registration Division (TS-767c)
OPP, EPA
Washington, DC 20460

Dear Hoyt:

Per our telephone conversation last week I have attached a list of pesticides for which IR-4 needs information.

The list consists of some of the pesticides that IR-4 would like to work on in 1987. Each has at least one state requesting at least one crop, and all are supposed to be discussed at a series of regional IR-4 meetings in October. The problem is that IR-4 has limited resources and cannot work on all requests in any single year. Thus, IR-4 would like to know if there are any pesticides on the list that are not worth any efforts at this time.

For instance, mancozeb is on the list. According to my CFR, there have not been any new tolerances established since 1972 and I guess this is because of the metabolite ETU. However, Rohm & Haas assures IR-4 that they are working on it. The question is, should IR-4 work on it in 1987? If EPA expects that all the problems will be resolved by 1989, then IR-4 can do field work in 1987, analyze samples in 1988, and submit petitions in 1989. If EPA thinks the chances will still be poor for new tolerances in 1989, then IR-4 should not discuss it at the October meetings.

Another example from the attached list is nitrapyrin. Dow has told IR-4 that all toxicity data gaps will be filled in 1989. Does that agree with what EPA expects? Are there other problems, such as ground water or endangered species, that might delay approvals of new tolerances for nitrapyrin beyond 1989?

IR-4 does not want to work on pesticides with little chance for new tolerances in the next 3 years and it does not want something unexpected, such as ground water concern stopping oxamyl, or a new metabolite, such as acetamide, stopping methomyl. Both oxamyl and methomyl are on the attached list and should IR-4 drop them from consideration for field work in 1987?

IR-4 needs a response before Labor Day because that is when the researchable projects must be sent out for the October regional meetings. Perhaps a visit by Dick Guest and I sometime in August would be the best way to do it. Just get the folks in HED to give the odds for each pesticide in 1989.

Sincerely yours,



Drew M. Baker, Jr.
Environmental Scientist

DMB/al

Att.

cc: Dr. R.H. Kupelian, National Director, IR-4 Project
Dr. R. Guest, IR-4
Mr. J. Housenger, EPA
Dr. F. Boyd, EPA

SOME IR-4 PESTICIDES WHICH MAY BE
RESEARCHABLE IN 1987

Acephate	Methamidophos
Acifluorfen	Methidathion
Aldicarb-	Methiocarb
Amdro	Methomyl
Ametryn	Methyl Bromide
Amitraz	Metolachlor
Asulam	Mevinphos
Azinphos Methyl	Molinate
B.T. Israelensis	NAA
Benomyl	Napropamide
Bensulide	Naptalam
Bentazon	Nitrapyrin
Captafol	Oxamyl
Captan	Oxydemetonmethyl
Carburofan	Oxyfluorfen
Chlorothalonil	Paraquat
Chlorpyrifos	Parathion
Cyhexatin	PCNB
Dalapon	Pendimethalin
DCNA	Phosmet
DCPA	Prometryn
Diazinon	Pronamide
Diclofop-Methyl	Propachlor
Dicofol	Propanil
Diethatyl-Ethyl	Propargite
Diflubenzuron	Propazine
Dimethazone	Pyrazon
Dimethoate	Sethoxydim
Dinoseb	Simazine
Diquat	Sodium Chlorate
Disulfoton	Sodium Fluoaluminate
Diuron	Streptomycin
Endosulfan	Terbufos
Ethephon	Terbutryn
Ethion	Thiobencarb
Ethoprop	Thiodicarb
Etridiazole	Thiophanate Methyl
Fenamiphos	Triallate
Fensulfothion	Triphenyltin Hydroxide
Fenthion	Zinc Phosphite
Fluazifop-p-butyl	Ziram
Fonofos	2,4-DB
Formetanate Hydrochloride	4-CPA
Gibberellic Acid	
Linuron	
Malathion	
Mancozeb	
Maneb	
Metalaxyl	