

US EPA ARCHIVE DOCUMENT

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

MEMORANDUM

**SUBJECT:** Amendment to the Methamidophos Registration Standard Issued September 30, 1982

**FROM:** William H. Miller (16)  
Insecticide-Rodenticide Branch  
Registration Division

**TO:** Methamidophos Standard Support Team

This memo is being transmitted to the methamidophos support team for concurrence on the amended ecological effects data requirements for the subject Standard.

The attached notice and amended table A-5 includes the addition of the following two studies not previously required in the subject standard.

1. 163.70-1 Special Test: Field Residue Monitoring.
2. 163.71-5 Actual Field Testing for Birds.

A copy of the Ecological Effects Branch (EEB) memo of September 23, 1985, recommending that the methamidophos Standard be amended to include the above listed additional data requirements and to indicate that the pen study is no longer required is attached for reference.

At the time of issuance of the Standard, it was EEB's policy to recommend that simulated (small pen) studies be conducted to assess the potential risk to avian species. We have been informed that present policy, however, is not to require pen studies as they are not likely to yield data useful in assessing such risks. Instead, actual field testing and monitoring studies are being required.

CONCURRENCES

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Thus, because the submitted pen study was reviewed and found to be invalid, and because it is unlikely that a valid pen study would yield useful data, EEB is not recommending that the pen study be repeated but that actual field testing and monitoring studies be conducted to address concerns for avian risk.

Accordingly, I am proposing that the methamidophos Standard be amended to: (1) change the data required under 71-5 from simulated testing for birds to actual field testing for birds; and (2) add field residue monitoring (70-1) as a new data requirement.

Attachments: 3(c)(2)(B) Letter to Registrant  
Amended Ecological Effects Data Table  
EEB memo of September 23, 1985