

US EPA ARCHIVE DOCUMENT

Shaughnessy No.: 101201

Date Out of EAB: **APR 5 1988**

To: William Miller
Product Manager 16
Registration Division (TS-767)

From: Frank Davido, Chief
Field Studies and Special Projects Section #5
Exposure Assessment Branch/HED (TS-769C)

THRU: Paul F. Schuda, Chief
Exposure Assessment Branch/HED (TS-769C)



Attached, please find the EAB review of...

Reg./File # : 239-2452 and 3125-341

Chemical Name: METHAMIDOPHOS

Type Product : Insecticide

Product Name : MONITOR® Technical

Company Name : Chevron and Mobay in consortium

Purpose : Submission of a proposed reentry interval in response to
the requirements of the Registration Standard for METHAMIDOPHOS

Date Received: 11/1/85

Action Code: 655

Date Completed: 4/5/88

EAB #(s) : 6141 and 6142

Monitoring study requested:

Total Reviewing Time: 6.5 hr

Monitoring study voluntarily:

Deferrals to: Ecological Effects Branch
 Residue Chemistry Branch
 Toxicology Branch

REVIEW OF REENTRY DATA

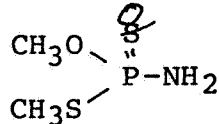
1. CHEMICAL: 101201

Common name: METHAMIDOPHOS

Product name: MONITOR® Technical

Chemical name: O,S-dimethyl phosphoramidothioate

Structure:



Other names: Monitor, Nitofol, Tamaron

2. TEST MATERIAL:

None

3. STUDY/ACTION TYPE:

Review of a proposed reentry interval

4. STUDY IDENTIFICATION:

Reg. File Nos. 239-2452 and 3125-341
Accession No. 259942
Record Nos. 161561 and 161562

5. REVIEWED BY:

James D. Adams, PhD
Chemist

Field Studies and Special Projects Section #5

James D. Adams

4/5/1988

6. APPROVED BY:

Frank Davido, Chief

Field Studies and Special Projects Section #5
Exposure Assessment Branch, HED (TS-769)

Frank L. Davido

4/5/1988

7. CONCLUSIONS:

The proposed 24-hour reentry interval for products containing METHAMIDOPHOS is not acceptable, and the proposed labels are not acceptable. A 48-hour reentry interval is indicated.

8. RECOMMENDATIONS:

The Registrants should be directed to alter their labels to include a 48-hour reentry interval. The remaining parts of the proposed labels are acceptable for reentry protection.

9. BACKGROUND:

The Registration Standard for METHAMIDOPHOS required the Registrants to propose reentry interval(s) for their product. This was an early Registration Standard and contained the option that the Registrant could propose a Federal reentry interval based on the longest existing reentry interval. At that time, the longest reentry interval was the 24-hour interval established by the California Department of Food and Agriculture (CDFA) in the California Administrative Code, Title 3, Section 249 (2)(C). That regulation is a blanket establishment of reentry intervals for all category one pesticides.

10. DISCUSSION OF INDIVIDUAL TESTS OR STUDIES:

This submission is a response to the Registration Standard, and conforms to one of the options allowed there for proposal of a reentry interval. No tests were conducted. There is no data in this submission to support the proposed reentry interval.

After monitoring fieldworker poisoning episodes and foliar dislodgeable residues in the field, CDFA has seen the need to establish a specific reentry interval of 2-days [the California Administrative Code, Title 3, Chapter 6, Section 6772 (C)]. A reentry level of 0.66 ng/cm² has also been established [CDFA Report HS-1280].

The consensus among scientists doing research on prevention of fieldworker poisonings - i.e. reentry research - is that environmental conditions in California and other arid areas are most conducive to persistence of toxic pesticide residues and that the hazard for fieldworkers is greatest in those areas. I suggest that in this case, the Agency should accept the Registrants proposal that the CDFA reentry interval be a Federal Standard. This would mean a 48-hour reentry interval rather than 24-hour interval mentioned in the submission. The Registrants would have the option to accept this 48-hour reentry interval for the entire U.S. or to submit data to justify different reentry interval(s) as discussed in Subdivision K of the Pesticide Assessment Guidelines.

11. COMPLETION OF ONE-LINER:

Done

12. CBI APPENDIX:

Not applicable