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

MAY 12 1994

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MEMORANDUM

Handy
5-12-94

SUBJECT: Response to the Acephate Reregistration Standard:
Memo of Meeting Held on 5/11/94 (No MRID, No CBRS
No., No Barcode No.).

FROM: R. B. Perfetti, Ph.D., Chemist *RB Perfetti*
Special Review Section 1
Chemistry Branch II: Reregistration Support
Health Effects Division (7509C)

THRU: W. J. Hazel, Ph.D., Section Head *Edward Hazel, for*
Reregistration Section 2
Chemistry Branch II: Reregistration Support
Health Effects Division (7509C)

TO: Lois Rossi, Chief
Reregistration Branch
Special Review & Reregistration Division (7508W)

Attendees: Valent Personnel
R. Richards, RB/SRRD
R. Perfetti, CBRS/HED

Valent came in to discuss questions regarding residue chemistry requirements in the acephate DCI. The following is the guidance which they were given:

- 1) With respect to crop field trials on mint, additional data are needed. A higher tolerance may have to be proposed.
- 2) With respect to field trials on grasses, if the rates for the fireant mound treatment are the same as the broadcast rate, then field trials will be needed only for the broadcast application. Specific calculations should be provided to demonstrate that the rates are equivalent. The Registrant should provide a rationale for the problem of hot spots occurring when the mounds are treated, i.e. the cattle would not stay around the mounds for very long. Also, CBRS recommends that a total of 12 trials be performed with analysis of two independently composited samples



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per trial. Trials should be performed in all regions of the USA. Also, warm and cold weather grass species should be utilized.

3) The Registrant should submit a protocol for the required tobacco pyrolysis study.

4) No data are required for bean cannery waste since it is no longer a feed item in the revised Table II. A waiver should be requested.

5) Seed treatments are considered to be food uses. If the radish seed treatment use is to be supported, then residue data are needed. The Registrant stated that they would request a waiver along with arguments that this is not a food use. They were told that CBRS would consider a waiver request but that it would probably be denied. The Registrant was also told that 5 field trials would suffice in order to establish a tolerance on radishes.

6) With respect to the required metabolism studies, the Registrant was informed that, if they did not wish to perform 6 plant metabolism studies using labeled C-methyl and C-acetyl acephate, then they could propose a lesser number and type of studies and CBRS would consider the proposal. The Registrant was informed that guideline studies are needed for all pesticides. The Registrant stated that they had no recent metabolism studies. The Registrant was told that the demonstration of incorporation into natural products meant the isolation and identification of labeled bio-molecules, i.e., glucose, lactose, amino acids, etc.

The meeting ended at this time.

If you need additional input, please advise.

cc: RBP, Acephate Reregistration Standard File, Acephate Subject File, RF and Circ..