September 9, 1998

This document was submitted to EPA by a registrant in connection with EPA's evaluation of this chemical and it is presented here exactly as submitted.

A SM 07/OPP #34137

CYANAMID

This Submission Contains 40 CFR Part 158 Data

American Cyanamid Company
Agricultural Products Research Division
P.O. Box 400
Princeton, NJ 08543-0400
Phone (609) 716-2000
General Fax (609) 275-3582

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JUL 29 1998
OPP PUBLIC DOCKET

Mr. Jason Robertson
Office of Pesticide Programs
Special Review and Reregistration Division [7508W]
U.S. EPA; Crystal Mall, Bldg. #2, Rm. 266A
1921 Jefferson Davis Highway
Arlington, VA 22202

December 1, 1997

RE: TRANSMITTAL LETTER: Phorate Reregistration; Case No. 103; Response to HED Draft Science Chapter and Submission of Acute and Chronic Dietary Risk Assessment and New Toxicology Data.

Dear Mr. Robertson:

On August 11, 1997, American Cyanamid Company (ACCo) received the draft science chapter completed by the Health Effects Division (HED) for phorate. The cover letter from the Special Review and Reregistration Division (SRRD) to American Cyanamid and the internal Agency summary memorandum from HED to SRRD are enclosed as Exhibit 1.

At this time ACCo wishes to respond to the draft HED science chapter by submitting the following (in triplicate):

1) Response to concerns expressed in Points 1-3 by the Toxicology Branch II of HED (see Exhibit 2 in this volume);

2) Response to concerns expressed in Point 4-8 by the Chemistry Branch II of HED (see Exhibit 3 in this volume).

Additionally we have enclosed a transmittal document (Volume 2), a new 90-day mouse toxicity study (Volume 3), and a Tier 3 "Monte Carlo" acute / chronic dietary exposure and risk assessment (Volume 4).

These rebuttals, new data, and dietary risk assessments are submitted to support the reregistration of phorate. The dietary risk assessments show that there are no chronic or acute toxicological concerns from potential phorate residues in food or drinking water. The response to the chemistry branch addresses each of their residue/labeling/rotational crop concerns while the toxicology response concludes that additional safety factors are not necessary due to the weight-of-the-evidence from existing developmental/reproduction studies. Thus we respectfully request that the Agency consider the enclosed information prior to the finalization of the reregistration eligibility document for phorate.

A response to the EFED draft chapter will be submitted under separate cover. I can be reached at telephone number 609-716-2378, facsimile number 609-716-2333, or by e-mail at wrubelj@pt.cyanamid.com.

Sincerely,

John J. Wrubel

John J. Wrubel
Product Registrations Manager
U.S. Plant Regulatory Affairs

cc: A. Baldi, Aceto Agricultural Chemical Corp.

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