Message

From: Blankinship, Amy [Blankinship.Amy@epa.gov]
Sent: 9/16/2020 12:02:04 PM
To: Adeeb, Shanta [Adeeb.Shanta@epa.gov]; Rate, Debra [Rate.Debra@epa.gov]
CC: Wente, Stephen [Wente.Stephen@epa.gov]; Lin, James [lin.james@epa.gov]
Subject: RE: Aldicarb - Request - Modeling worst case with current water distribution numbers

Thanks Shanta!

From: Adeeb, Shanta <Adeeb.Shanta@epa.gov>
Sent: Wednesday, September 16, 2020 7:42 AM
To: Blankinship, Amy <Blankinship.Amy@epa.gov>; Rate, Debra <Rate.Debra@epa.gov>
Cc: Wente, Stephen <Wente.Stephen@epa.gov>; Lin, James <lin.james@epa.gov>
Subject: RE: Aldicarb - Request - Modeling worst case with current water distribution numbers

Good Morning Amy,

Debra is on leave. I am looking into this and I will get back to you soon.

Shanta

From: Blankinship, Amy <Blankinship.Amy@epa.gov>
Sent: Wednesday, September 16, 2020 7:08 AM
To: Rate, Debra <Rate.Debra@epa.gov>
Cc: Adeeb, Shanta <Adeeb.Shanta@epa.gov>; Wente, Stephen <Wente.Stephen@epa.gov>; Lin, James <lin.james@epa.gov>
Subject: RE: Aldicarb - Request - Modeling worst case with current water distribution numbers

Hi Debra,

We have started to work on the PCA/PCT portion of the drinking water. To do this work we need to engage BEAD on getting some additional information on PCT and other use parameters not only for the new use but for other registered uses as well. Below is the use table we used in the drinking water so far, and is based on previous assessments used for registration review. However, before we engage BEAD with our asks, I wanted to double check to make sure this information is correct. It seems like there are only 2 active labels – the one being modified and another from AgLogic that appears to be basically the same. In looking over the 2 labels, the information below appears to be correct.

I suspect that HED had to have current information for their dietary assessment, but I don't think I've seen what they have used to support this new use. It's also quite possible that I am missing some information that may have been sent around previously for this action.

Any thoughts or information you may have (again sorry if I missed something) would be appreciated.

Thanks,
Amy

Use	Max. Single App. Rate (lbs a.i./A)	Max. Annual App. Rate (lbs a.i./A)	Min. App. Interval (d)	App. Method	Labeled Use States
Cotton	1.05 (At Planting) 0.75 (Side Dress) 2.1 (Side Dress)*	1.8 3.15*	21	at-plant: in furrow and T-band post-emergent: in furrow	U.S. *[CA only]
Dry Beans	2.1	2.1	0	at-plant: in furrow	CO, ID, MI, OR, WA only
Peanuts	1.05 (At Planting) 1.5 (Post-Emergence)	2.55	14	at-plant: in furrow, incorporated band or T-band post-emergent: banded over foliage	U.S. [Split application only in AL, FL, GA, NC, OK, TX, VA]
Soybeans	1.05	1.05	0	at-plant: in furrow or T-band	GA, NC, SC, VA only
Sugar Beets	4.95 (At Planting) 3.0 (Post-Emergence) 4.05 (Post-Emergence) 2.1 (At Planting)* 2.1 (Side Dress)*	4.95 4.2*	14	at-plant: in furrow, incorporated band or T-band post-emergent: in furrow, incorporated side band or side dress	[CO, ID, MT, NE, OR, WA, WY only] *[CA only]
Sweet Potatoes	3.0	3.0	0	pre-plant or at-plant: band covered by hilling	LA, MS only

From: Rate, Debra <Rate.Debra@epa.gov>
Sent: Tuesday, September 15, 2020 6:56 AM
To: Donovan, William <donovan.william@epa.gov>; Blankinship, Amy <Blankinship.Amy@epa.gov>
Cc: Metzger, Michael <Metzger.Michael@epa.gov>; Johnson, Marion <Johnson.Marion@epa.gov>; Adeeb, Shanta <Adeeb.Shanta@epa.gov>
Subject: RE: Aldicarb - Request - Modeling worst case with current water distribution numbers

Thank you, Will!

From: Donovan, William <donovan.william@epa.gov>
Sent: Monday, September 14, 2020 7:44 PM
To: Blankinship, Amy <Blankinship.Amy@epa.gov>; Rate, Debra <Rate.Debra@epa.gov>
Cc: Metzger, Michael <Metzger.Michael@epa.gov>; Johnson, Marion <Johnson.Marion@epa.gov>; Adeeb, Shanta <Adeeb.Shanta@epa.gov>
Subject: RE: Aldicarb - Request - Modeling worst case with current water distribution numbers

Hi Debra,

Yes, I could run the dietary assessment assuming no domestic grapefruit use and will run the water values once they are available. On leave tomorrow but can start setting things up later this week. Thanks,

Will

From: Blankinship, Amy <Blankinship.Amy@epa.gov>
Sent: Monday, September 14, 2020 5:56 PM
To: Rate, Debra <Rate.Debra@epa.gov>; Donovan, William <donovan.william@epa.gov>
Cc: Metzger, Michael <Metzger.Michael@epa.gov>; Johnson, Marion <Johnson.Marion@epa.gov>; Adeeb, Shanta <Adeeb.Shanta@epa.gov>
Subject: RE: Aldicarb - Request - Modeling worst case with current water distribution numbers

Hi,

Thanks for confirming the label parameters. EFED does have numbers that we can provide HED.
Currently, our EDWCs are based on the shallowest depth of 2 inches. We would need to run new numbers with a 1.5 in. I don't know how much difference there will be, but we can scope that out before we send any numbers to HED.

Thanks,
Amy

From: Rate, Debra <Rate.Debra@epa.gov>
Sent: Monday, September 14, 2020 5:00 PM
To: Blankinship, Amy <Blankinship.Amy@epa.gov>; Donovan, William <donovan.william@epa.gov>
Cc: Metzger, Michael <Metzger.Michael@epa.gov>; Johnson, Marion <Johnson.Marion@epa.gov>; Adeeb, Shanta <Adeeb.Shanta@epa.gov>
Subject: Aldicarb - Request - Modeling worst case with current water distribution numbers

Hi Amy, Will,

Sorry it has taken a bit of time for me to get back to you following the last team meeting.

Marion has met with Marietta and she does want to know what the current dietary risk picture is with water numbers – so there will be a before and after picture of the risk once EFED has applied the new modeling/refinements.

Amy, does EFED have current water distribution numbers (surface water) that can be provided to Will (HED) to use in the DEEM run? Do you need to do any additional work to get these numbers? Will, would you be able to run the DEEM when you get the new numbers?

Amy: Additionally, the registrant has confirmed that the incorporation depth and well setback numbers provided on the proposed labeling are correct (i.e., 2-3 inches incorporation). Even though the registrant says 2-3 inches incorporation, based on the conversation with the registrant and BEADs research, I think we are hoping that you might be able to run a range of depths that would also include 1.5 inches (max. depth stated on call with registrant in January '20).

Will: When we were discussing the status of our reviews with the registrant, we planted the seed that they may want to begin thinking about other crops/uses that may need to be cancelled to allow for the citrus uses. They said that it would be unlikely that the registrant would cancel any existing uses, but that maybe they would consider letting go of grapefruit. Would it also be possible to do a DEEM run for food alone without the grapefruit use to let us see how much room in the risk cup might be gained?

We really appreciate your help in running these extra modeling runs/scenarios. Please let me know if you have any questions.
Many thanks!
Debra

Debra Rate, Ph.D.
Senior Regulatory Specialist

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