

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Date: 02/22/2005

MEMORANDUM

SUBJECT: Napropamide: Response to Registrant's Error Comments on EPA's Preliminary Risk Assessments for the Reregistration Eligibility Decision for Napropamide. PC Code: 103001, Case #: 2450, DP Barcode: D305595

Regulatory Action: Phase 2 Reregistration Action
Risk Assessment Type: Single Chemical Aggregate

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THROUGH: Catherine Eiden, Branch Chief
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TO: Demson Fuller; Chemical Review Manager
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In this document, HED is responding to the registrant's comments on the Phase I risk assessment for Napropamide (*Registrant's Error Comments on EPA's Preliminary Risk Assessments for the Reregistration Eligibility Decision for Napropamide*, submitted January 19, 2005). The tables listing the registrant's specific comments on the risk assessment documents have been amended to include a column for HED's response. The amended tables are attached.

**30-DAY ERROR RESPONSE TO “HED CHAPTER OF THE REREGISTRATION
ELIGIBILITY DECISION DOCUMENT (RED). PC CODE 103001, CASE # 2450,
DP Barcode D308278”. 11/18/04.**

Header	Page and Location	Registrant Error Correction Comment	HED Response
2.0 Ingredient Profile	4, paragraph 2	Correct the second sentence since all wettable powder formulations have been cancelled effective 10/15/04.	Corrected in the revised document.
	5, Table 2.2	Add footnote 1 to EP 70506-28. Add two other registrations 70506-63, Devrinol 2-EC Ornamental and 70506-64, Devrinol 2-EC Selective (both are 24.1% EC formulations).	Corrected in the revised document.
	5, Table 2.3	Correct the density to 0.584 g/mL.	Corrected in the revised document.
3.3 Environmental Degradation	10	The photolytic half-life in water cited in the EFED risk assessment is 6.8 minutes.	Corrected in the revised document.
3.5.1 Tabular Summary	10, Table 3.5	Footnote 1 can be revised to remove the last part of the first sentence. Current labels reflect the plant-back intervals specified (see Devrinol 50-DF, EPA Reg. No. 70506-36 approval dated 7/28/04, and Devrinol 2-EC, EPA Reg. No. 70506-64, approval dated 7/19/04).	Corrected in the revised document.
4.1 Hazard Characterization	11, second paragraph	The last sentence on the page should be corrected to read “...were observed in livers from male rats fed 48 mg napropamide/kg/day...”.	Corrected in the revised document.
4.1 Hazard Characterization	13, Table 4.1a	Correct the typo in the MRID for 870.26 to 40362903.	Corrected in the revised document.
4.2.6.2 Degree of Concern Analysis and Residual Uncertainties for Pre and/or Post-natal Susceptibility	18	The second sentence should be corrected: a 3-generation reproduction study was conducted with napropamide.	Corrected in the revised document.
6.1.1 Residue	32, first paragraph	The last sentence can be	Corrected in the revised

Header	Page and Location	Registrant Error Correction Comment	HED Response
Profile		corrected to add apple juice and pomace.	document.
6.1.1 Residue Profile	32, last paragraph	Correct the statement since all current labels have been changed to reflect the plant-back intervals specified (see Devrinol 50-DF, EPA Reg. No. 70506-36 approval dated 7/28/04, and Devrinol 2-EC, EPA Reg. No. 70506-64, approval dated 7/19/04).	Corrected in the revised document.
6.2 Water Exposure/Risk Pathway	34	All values are overestimates because the use patterns selected are not registered. See Section II General Comments, above, regarding current use patterns. Footnote a: Napropamide is not applied using foliar applications. Applications are made to the area directly under and around the trees/bushes.	EFED issue. If revisions are needed in the dietary assessment based on changes in EFED's drinking water assessment, they will be incorporated in HED's Phase III response. HED notes, however, that dietary risk estimates based on the current drinking water assessment are well below HED's level of concern and that further refinements may not be warranted.
6.3.1.3 Residential Handler Exposure and Risk Assessments	37, Table 6.3.1	In the column "Inhalation Dose (mg/kg/day)" there is a reference to footnote 5 but there is no footnote 5 at the end of the table (other footnotes are letters).	Corrected in the revised document.
6.3.2.3 Residential Postapplication Exposure and Risk Estimates	40	SA units should be corrected to cm ² .	Corrected in the revised document.
10.2 Residue and Product Chemistry Deficiencies	52	The 5 th bullet point should be corrected to read "...appropriate <u>plant-back intervals (PBI)</u> ." However, current labels have already been changed to reflect the PBIs.	HED intended wording as "preharvest intervals (PHIs)". Not all crops have PHIs specified on labels.
Appendix 1.0	54	For guideline 870.3100, additional data should not be required since data were fulfilled and accepted in chronic studies.	Corrected in the revised document.
Appendix 2.0	55, 21-Day Dermal	Correct the second word in the first sentence to "of".	Corrected in the revised document.

Header	Page and Location	Registrant Error Correction Comment	HED Response
Appendix 3.0, Currently Registered Uses	58-85	All registrant corrections regarding the referenced table of uses can be found in the section of this document which contains comments on Residue Chemistry Considerations (corrections on Appendix 1, Table A2, pages 76-119 of that document). The two tables are essentially identical.	HED has removed Appendix 3.0 from the revised document. Table A2 is generated as a report for internal OPP use, and many of the registrant's comments reflect a misunderstanding of language used in the report. Although Table A2 needs to be updated to reflect current labels, HED's risk assessment was based on the correct, current uses and rates. Therefore, no error corrections to the risk assessment are required based on the registrant's comments on Table A2.

**30-DAY ERROR RESPONSE TO “NAPROPAMIDE. RESIDUE CHEMISTRY
CONSIDERATIONS FOR REREGISTRATION ELIGIBILITY DECISION”.**
DP Barcode D305600. 11/15/04.

Header	Page and Location	Registrant Error Correction Comment	HED Response
Executive Summary	2, second paragraph	The 50% WP formulations have been voluntarily cancelled (EPA Reg. Nos. 70506-26 and -29); cancellation was effective 10/15/04.	Corrected in revised document.
Executive Summary	3, second paragraph	Add apple juice and pomace to the last sentence regarding storage stability in processed commodities.	Corrected in revised document.
Executive Summary	4, second paragraph	The appropriate crop rotation restrictions have been added to the following labels: Devrinol 50DF Selective (approved 7/28/04, EPA Reg. No. 70506-36) and Devrinol 2-EC Selective (approved 7/19/04, EPA Reg. No. 70506-64).	Corrected in revised document.
Regulatory Recommendations and Residue Chemistry Deficiencies	4, last bullet	Change the words “preharvest intervals (PHIs)” to “plantback intervals (PBIs)” as noted in paragraph 2 on this page.	HED intended wording as “preharvest intervals (PHIs)”. Not all crops have PHIs specified on labels.
Background	5, Table 2	Correct the density to 0.584 g/ml (see comments to Product Chemistry Considerations, D305599).	Corrected in revised document.
860.1200 Directions for Use	6, Product List	All Syngenta napropamide products were transferred to United Phosphorus, Inc. on July 24, 2003, and are no longer valid registrations.	Corrected in revised document.
860.1200 Directions for Use	7, Table 3	All Syngenta napropamide products were transferred to United Phosphorus, Inc. on July 24, 2003, and are no longer valid registrations. Correct the header to remove Syngenta Crop Protection. The following corrections are for UPI products: 70506-26 and -29 – cancellations effective 10/15/04 70506-28 – cancellation requested 12/6/04	Corrected in revised document.

Header	Page and Location	Registrant Error Correction Comment	HED Response
		<p>70506-30 – cancellation effective 10/15/04</p> <p>70506-32 – cancellation effective 10/15/04</p> <p>70506-39 –correct product name spelling to Devrinol; the formulation is a 2% granular.</p> <p>Add the following products to this list:</p> <p>70506-63 Devrinol 2-EC Ornamental Herbicide, registered 5/24/04</p> <p>70506-64 Devrinol 2-EC Selective Herbicide, registered 5/24/04.</p> <p>Footnotes 2 and 37: the reference to making a change to the plant back interval (PBI) on the labels can be removed since the PBIs have been added to the labels.</p>	
860.1200 Directions for Use	8, Table 3, footnote 3	Correct the product name for the final product listed: it should read (Devrinol <u>5G</u> Ornamental).	Corrected in revised document.
Summary of Residue Chemistry Data Requirements	10, Table 4 Basil, Marjoram 11, Table 4 Winter savory	UPI is submitting data from IR-4 to support unrestricted registration of these crops.	Data will be reviewed upon receipt.
Use Pattern Table	11, Table 4	The current 40CFR tolerances for Cranberry, Grape, and Strawberry are noted as “Not Established” but these tolerances are currently active under the obsolete crop group “Fruit, small” [see 40 CFR § 180.328(a)]. A separate footnote <u>must</u> be added to explain this fact so that, when this document is available during the Public Review process, growers do not become concerned that uses on these three crops are illegal because no tolerances exist.	Corrected in revised document.
Use Pattern Table	12, Table 4, Coffee Processing	A coffee bean processing study was submitted. See MRID 92125074 for the Phase 3 summary, and	Corrected in revised document.

Header	Page and Location	Registrant Error Correction Comment	HED Response
		140144 for the original study.	
Berry Group	41	In the paragraph beginning “Crop field trial data”, third line, change the number 196 to 176 to match the field testing data.	Corrected in revised document.
Blueberry	42	In the second line, change 196 to 176 to match the field testing data.	Corrected in revised document.
Basil	44	UPI is submitting data from IR-4 to support unrestricted registration of this crop.	Data will be reviewed upon receipt.
Marjoram	45	UPI is submitting basil data from IR-4 to support unrestricted registration of this crop.	Data will be reviewed upon receipt.
Winter savory	46	UPI is submitting basil data from IR-4 to support unrestricted registration of this crop.	Data will be reviewed upon receipt.
Cranberry	49, 50	The Agency is requiring residue testing at 9 lbs ai per acre, one application, in NJ or MA. UPI points out that this use pattern has been covered sufficiently by trials submitted in MRID 00118001 (see Phase 3 Summary MRID 92125049), and no additional trials for this use rate should be required.	Corrected in revised document.
860.1500 Crop Field Trials	54, Pistachio	The use pattern with 2 applications was on the 50WP label, which has been cancelled. There is now only the single application with a maximum rate of 4 lb ai/A.	Corrected in revised document.
860.1500 Crop Field Trials	55, Pomegranate	The use pattern with 2 applications was on the 50WP label, which has been cancelled. There is now only the single application with a maximum rate of 4 lb ai/A and maximum seasonal rate of 4 lb ai/A.	Corrected in revised document.
860.1500 Crop Field Trials	56, Strawberry	The use pattern with 2 applications was on the 50WP label, which has been cancelled. There is now only the single application with a	Corrected in revised document.

Header	Page and Location	Registrant Error Correction Comment	HED Response
		maximum rate of 4 lb ai/A. No PHI is noted on the current label but the label does restrict application from bloom through harvest.	
860.1500 Crop Field Trials	56, Tobacco	In the paragraph which lists the registered formulations, delete references to the 50WP, which has been cancelled.	Corrected in revised document.
860.1520 Processed Food and Feed	57, Coffee	A coffee bean processing study was submitted. See MRID 92125074 for the Phase 3 summary, and 140144 for the original study.	Corrected in revised document.

30-DAY ERROR RESPONSE TO “NAPROPAMIDE. RESIDUE CHEMISTRY CONSIDERATIONS FOR REREGISTRATION ELIGIBILITY DECISION” Appendix 1: Food/Feed Use Pattern Table for Napropamide Generated by BEAD/OPP. DP Barcode D305600. 11/15/04.

Header	Page and Location	Registrant Error Correction Comments	HED Response
Appendix 1 – Food/Feed Use Pattern Table for Napropamide	Table A2	<p>General comments: This table is called Table A2. If there is not a Table A1, the registrant suggests this table be renamed.</p> <p>The registrant does not understand the header “Foliar” contained throughout this table. As a preemergent herbicide, this product is never applied (1) to the leaves of crops or (2) to the leaves of weeds (napropamide does not control established weeds). We have changed this term where it appears in the table to more appropriate wording.</p> <p>The registrant does not understand the header “Postemergence” contained throughout this table. Does the Agency mean to indicate application after the emergence of the weed, or</p>	HED has removed Appendix 1 from the Residue Chemistry chapter. Table A2 is generated as a report for internal OPP use, and many of the registrant’s comments reflect a misunderstanding of language used in the report. Although Table A2 needs to be updated to reflect current labels, HED’s risk assessment was based on the correct, current uses and rates. Therefore, no error corrections to the risk assessment are required based on the registrant’s comments on Table A2.

Header	Page and Location	Registrant Error Correction Comments	HED Response
		<p>after emergence of the crop being treated? Napropamide is not effective on established weeds, since its activity is on the germination of the seed, and thus it would not be effective on postemergent weeds. If the term is meant to apply to crops, then the registrant does not understand what “postemergence” would mean in relation to a tree crop, for instance.</p> <p>It is UPI’s understanding that the term “Transplant” means application at or immediately following transplanting.</p> <p>UPI questions the meaning of the term “Seed bed”. It is our understanding that this term refers to the establishment of daughter plants. With the exception of tobacco, peppers, tomatoes, and sweet potatoes, this product is not applied to any crops as a “Seedbed” application. This row should be removed from all crop listings except tobacco, peppers, tomatoes, and sweet potatoes.</p>	
ALMOND	76, Foliar	Change “Foliar” to “Directed Postplant, Band Spray”.	
APPLE	77, Foliar	Change “Foliar” to “Directed Postplant, Band Spray”.	
APRICOT	78, Foliar	Change “Foliar” to “Directed Postplant, Band Spray”.	
ARTICHOKE	79, Foliar	Change the Max Seasonal Rate from NS to 4. Change the Max # Apps from NS to 1. Change “Foliar” to “Postplant, Basal Spray/Broadcast/Directed/Gr ound”.	
ASPARAGUS	80, Foliar	Change Max Seasonal Rate to 4. Change Max # Apps from NS to 1. Change “Foliar” to “Postemergence”.	
AVOCADO	81, Foliar	Change “Foliar” to “Directed Postplant, Band Spray”.	

Header	Page and Location	Registrant Error Correction Comments	HED Response
BLACKBERRY	81, Foliar	Change Max Seasonal Rate to 4. Change “Foliar” to “Directed Postplant, Band Spray”.	
	81, Postemergence	Change Max Seasonal Rate to 4.	
BLUEBERRY	82, Foliar	Change Max Seasonal Rate to 4. Change Max # Apps from NS to 1. Change “Foliar” to “Directed Postplant, Band Spray”.	
BOYSENBERRY	83, Foliar	Change Max Seasonal Rate to 4. Change Max # Apps from NS to 1. Change “Foliar” to “Directed Postplant, Band Spray”.	
	83, Postemergence	Change Max Seasonal Rate to 4. Remove NS from Max # Apps.	
BROCCOLI	83, Postplant	Change Max Seasonal Rate from NS to 2. Change description to “Postplant over Seed or Transplants”.	
	83, Preplant	Change Max Seasonal Rate from NS to 2.	
	Transplant	Change Max Seasonal Rate from NS to 2.	
BRUSSELS SPROUTS	85, Postplant, Preplant, Transplant	Change Max Seasonal Rate from NS to 2. Change description to “Postplant over Seed or Transplants”.	
CABBAGE	86, Postplant, Preplant	Change Max Seasonal Rate from NS to 2. Change description to “Postplant over Seed or Transplants”.	
	87, Transplant	Change Max Seasonal Rate from NS to 2.	
CAULIFLOWER	87, Postplant, Preplant	Change Max Seasonal Rate from NS to 2. Change description to “Postplant over Seed or Transplants”.	
	88, Transplant	Change Max Seasonal Rate from NS to 2.	
CHERRY	89, Postemergence	Change Max Seasonal Rate from NS to 8.	
	90, Foliar	Change “Foliar” to “Directed Postplant, Band Spray”.	
CITRUS	90, Foliar	Change Max Seasonal Rate from NS to 8; change Max # Apps from NS to 2.	

Header	Page and Location	Registrant Error Correction Comments	HED Response
		Change “Foliar” to “Directed Postplant, Band Spray”.	
CRANBERRY	90, Foliar	Max Single App is 15 lbs only in very specific areas (heavy muck soils in OR and WA). More representative rate is 9 lbs.	
	90, Postharvest, Postplant	Delete these use descriptions as they are redundant.	
CURRENT	91, Foliar	Change Max Seasonal Rate from NS to 4; change Max # Apps from NS to 1. Change “Foliar” to “Directed Postplant, Band Spray”.	
EGGPLANT	91, Preplant	Change Max Seasonal Rate from NS to 2.	
	92, Pretransplant, Transplant	Change Max Seasonal Rate from NS to 2.	
FIG	92, Foliar	Change “Foliar” to “Directed Postplant, Band Spray”.	
	92, Postemergence	Change Max Seasonal Rate from NS to 8; change Max # Apps from 1 to 2.	
FILBERT	94, Foliar	Change “Foliar” to “Directed Postplant, Band Spray”.	
	94, Postemergence	Change Max Seasonal Rate from NS to 8; change Max # Apps from 1 to 2.	
GRAPEFRUIT	94, Foliar	Change “Foliar” to “Directed Postplant, Band Spray”.	
	94, Postemergence	Change Max Seasonal Rate from NS to 8; change Max # Apps from 1 to 2. Change description to “Postemergence, soil application”.	
GRAPES	95, Foliar	Change “Foliar” to “Directed Postplant, Band Spray”.	
	95, Postemergence	Change Max Seasonal Rate from NS to 8; change Max # Apps from 1 to 2.	
KIWI	96, Foliar	Change “Foliar” to “Directed Postplant, Band Spray”.	
LEMON	97, Postemergence, Foliar	Change Max Seasonal Rate from NS to 8; change Max # Apps from 1 to 2. Change “Foliar” to “Directed Postplant, Band Spray”.	
LOGANBERRY	98, Foliar	Change “Foliar” to “Directed	

Header	Page and Location	Registrant Error Correction Comments	HED Response
		Postplant, Band Spray".	
MINT	99, Foliar	Change Max Seasonal Rate from NS to 4; change Max # Apps from NS to 1.	
NECTARINE	100, Postemergence	Change Max Seasonal Rate from NS to 8, change Max # Apps from 1 to 2. Change "Foliar" to "Directed Postplant, Band Spray".	
OLIVE	101, Foliar	Change "Foliar" to "Directed Postplant, Band Spray".	
ORANGE	101, Foliar	Change "Foliar" to "Directed Postplant, Band Spray".	
	102, Postemergence	Change Max Seasonal Rate from NS to 8, change Max # Apps from 1 to 2.	
PEACH	102, Foliar	Change "Foliar" to "Directed Postplant, Band Spray".	
	103, Postemergence	Change Max Seasonal Rate from NS to 8, change Max # Apps from 1 to 2.	
PEAR	104, Foliar	Change "Foliar" to "Directed Postplant, Band Spray".	
	104, Postemergence	Change Max Seasonal Rate from NS to 8, change Max # Apps from 1 to 2.	
PECAN	105, Foliar	Change "Foliar" to "Directed Postplant, Band Spray".	
	105, Postemergence	Change Max Seasonal Rate from NS to 8, change Max # Apps from 1 to 2.	
PEPPER	106, Posttransplant, Preplant	Change Max Seasonal Rate from NS to 2,	
	106, Transplant	Change Max Single Appl Rate from 4 to 2, change Max Seasonal Rate from NS to 2.	
PERSIMMON	107, Foliar	Change "Foliar" to "Directed Postplant, Band Spray".	
PISTACHIO	108, Foliar, Postemergence	Change Max Seasonal Rate to 4. Change "Foliar" to "Directed Postplant, Band Spray".	
PLUM	109, Foliar	Change "Foliar" to "Directed Postplant, Band Spray".	
	109, Postemergence	Change Max Seasonal Rate from NS to 8, change Max # Apps from 1 to 2.	
POMEGRANATE	109, Foliar	Change Max Seasonal Rate from 8 to 4, change Max #	

Header	Page and Location	Registrant Error Correction Comments	HED Response
		Apps from 2 to 1. Change “Foliar” to “Directed Postplant, Band Spray”.	
PRUNE	110, Foliar	Change “Foliar” to “Directed Postplant, Band Spray”.	
	110, Postemergence	Change Max Seasonal Rate from NS to 8, change Max # Apps from 1 to 2.	
RASPBERRY	111, Foliar, Postemergence	Change Max Seasonal Rate from NS to 4, change Max # Apps from NS to 1. Change “Foliar” to “Directed Postplant, Band Spray”.	
RHUBARB	112, Dormant	Change Max Seasonal Rate from NS to 4, change Max # Apps from NS to 1.	
STRAWBERRY	113, Established plantings, Foliar, Posttransplant, Prebloom	Change Max Seasonal Rate to 4. Change “Foliar” to “Dormant”.	
SWEET POTATO	114, Plant Bed, Posttransplant	Change Max Seasonal Rate from NS to 2, change Max # Apps from NS to 1.	
TANGELO	114, 115 Foliar	Change Max Seasonal Rate from NS to 8. Change “Foliar” to “Directed Postplant, Band Spray”.	
TANGERINE	115, Foliar	Change “Foliar” to “Directed Postplant, Band Spray”.	
	116, Postemergence	Change Max Seasonal Rate from NS to 8, change Max # Apps from 1 to 2.	
TOMATO	116, Posttransplant , Preplant	Change Max Seasonal Rate from NS to 2.	
	117, Transplant	Change Max Single Appl Rate from 4 to 2, change Max Seasonal Rate from NS to 2.	
WALNUT	117, Foliar	Change “Foliar” to “Directed Postplant, Band Spray”.	
	118, Postemergence	Change Max Seasonal Rate from NS to 8, change Max # Apps from 1 to 2.	
PRODUCT NUMBERS CONTAINED IN THIS REPORT	119 Table Footer	Remove 70506-26, 70506-29 because they have been cancelled. Add 70506-38, 70506-63, 70506-64.	
HOMEOWNER PRODUCTS CONTAINED IN	119 Table Footer	Add 70506-33 and 70506-39.	

Header	Page and Location	Registrant Error Correction Comments	HED Response
THIS REPORT			

**30-DAY ERROR RESPONSE TO “NAPROPAMIDE RED – REREGISTRATION
ELIGIBILITY DECISION. PRODUCT CHEMISTRY CONSIDERATIONS. CASE NO.
2450”. DP Barcode D305599. 10/29/04.**

Header	Page and Paragraph	Registrant Error Correction Comments	HED Response
Background Identification of Active Ingredient	3, Table 2 and Attachment 1, table 2	Correct the density; bulk density, specific gravity value to 0.584 g/mL.	Corrected in revised document.
Background Identification of Active Ingredient	4, Table 2 and Attachment 1, Table 2	UV/visible absorption: Report available for submission.	Data will be reviewed upon receipt.
830.1550-7950 Product Chemistry Data Requirements	5, Table 3, Footnote 1, 3, 5, 6	830.1550/1600/1620/1670/1700/1750/1800: Report on United Phosphorus' 95.7% technical available for submission.	Data will be reviewed upon receipt.
830.1550-7950 Product Chemistry Data Requirements	5, Table 3, Footnote 8 and Attachment 1, Table 2	Guideline No. 830.6313, Stability to normal and elevated temperatures is not applicable to napropamide technical since the product is stored in fiberboard drums with an inner plastic liner and is not in contact with metals.	Data are required demonstrating the stability of the TGAI with metals and metal ions. If the registrant can provide sufficient evidence that the TGIA will not contact any metal during storage or during processes to formulate EUPs, then this requirement may be waived.
Attachment 1: Review of Product Chemistry, OPPTS 830 Series	10, Table 1	Delete footnote number 2 as there is no CBI Appendix A.	Corrected in revised document.

**30-DAY ERROR RESPONSE TO “NAPROPAMIDE: OCCUPATIONAL AND
RESIDENTIAL EXPOSURE ASSESSMENT AND RECOMMENDATIONS FOR THE
REREGISTRATION ELIGIBILITY DECISION DOCUMENT”.**

DP Barcode 305598. 11/17/04.

Header	Page and Location	Registrant Error Correction Comments	HED Response
Cover sheet	1, list of EPA Reg. Nos.	Delete the following, as they have been cancelled: 70506-26, -28, -29, -30, - 32.	corrected in the revised document
Executive Summary	3	Change second to last sentence to indicate that the wettable powder products have been cancelled.	corrected in the revised document
Hazard Concerns	3, paragraph 1	On line 3, delete “(12”.	corrected in the revised document
	3, paragraph 2	Add end close quote to “Not Likely to Be Carcinogenic to Humans”.	corrected in the revised document
1.3 Summary of Hazard Concerns for Napropamide	6	The second sentence refers to Table 1 but it appears that the information is in Table 2.	corrected in the revised document
1.3 Summary of Hazard Concerns for Napropamide	7, Cancer	Add end close quote to “Not Likely to Be Carcinogenic to Humans”.	corrected in the revised document
1.3 Summary of Hazard Concerns for Napropamide	7, Acute Toxicity	The data referenced is in Table 1.	corrected in the revised document
1.3 Summary of Hazard Concerns for Napropamide	7, Table 1	Correct the typo in the MRID for 870.26 to 40362903.	corrected in the revised document
1.3 Summary of Hazard Concerns for Napropamide	8, Table 2	Place an asterisk (*) in front of the footnote to the table or delete the asterisk in the header of the third column.	corrected in the revised document
1.5.1 End Use Products	9, paragraph 1	The first and third sentences should be corrected to reflect the fact that only the 2% granular formulation is used by residential homeowners.	corrected in the revised document
1.5.1 End Use Products	9, Table 3	In the header, correct the spelling of “Summary”.	corrected in the revised document

Header	Page and Location	Registrant Error Correction Comments	HED Response
		Two registered products are missing from this list: Devrinol 2-G Selective, 70506-33 and Devrinol 2-EC Selective 70506-64. It might be helpful to list which of the registered products are for agricultural uses (70506-27, -31, -34, -36, -64), for professional ornamental uses (70506-33, -37, -38, -63) and for use by homeowners (70506-33, -39). The footnotes should be corrected to indicate that the products listed there have been cancelled effective 10/15/04, and for Devrinol 2-E Selective (70506-28) cancellation was requested 12/16/04.	
Type of Pesticide/Targeted Pest/Use Sites	9, first paragraph	The next to last sentence should be changed to read “all wettable powder products have been cancelled”.	corrected in the revised document
Type of Pesticide/Targeted Pest/Use Sites	9, second paragraph	Correct the spelling of “napropamide”. Correct the spelling of “cranberry”.	corrected in the revised document
1.5.2 Registered Use Categories and Sites	10	Capitalize the first word (<u>n</u> apropamide) in the first sentence of the paragraph.	corrected in the revised document
1.5.2 Registered Use Categories and Sites	10, Table 4	In the header, correct the spelling of “Acres”. We suggest adding the word “Maximum” to the second column header “APP Rate”, for clarity.	corrected in the revised document
1.5.2 Registered Use Categories and Sites	10, 11, 12, Table 4	Add the FIC formulation to the listing for the crop Loganberry. Add the G formulation to the listing for the crops Nectarine, Plum, Tobacco, Walnut. Add the EC formulation to the listing for the crops Strawberry and	FLC formulation has been added to loganberry. G formulation has been added to nectarine, plum, tobacco and walnut. EC formulation has been added to strawberry and tobacco.

Header	Page and Location	Registrant Error Correction Comments	HED Response
		<p>Tobacco. Add the DF formulation to the listing for Turf. Under Turf, delete the EC from column 3. Under Cranberry, the application rate should be corrected to 9 lb ai/A with application rates up to 15 lb ai/A allowed only for certain soil types (muck) in certain regions (WA, OR). The 15 lb rate represents less than 3% of the total cranberry usage. The DF formulation can be applied by chemigation only in Florida or the Western region (see label for map) or by groundboom. Delete chemigation under cranberries as this is not a method of application for this crop.</p>	<p>It is HED's policy to use the maximum application rate posted on the labels. In certain part of the country cranberry could be applied at a maximum rate of 15 lb ai/A. At the maximum rate cranberry has an acceptable risk.</p>
1.5.3 Application Methods	12, first sentence	Correct the spelling of "cranberry".	corrected in the revised document
2.1.1.1 Assumptions for Handler Exposure Scenarios	14, second bullet	At the beginning of the second line, replace "an" with "a".	corrected in the revised document
ORETF Handler Studies	16	Last sentence: delete the discussion of the last half with reference to homeowner exposure while using a hose-end sprayer. Only the granular formulation is ever applied by a homeowner and the granular product is not mixed with water or applied with a hose end sprayer. Delete the reference to the ORETF Study OMA004 since it is not discussed.	corrected in the revised document
2.1.3.2 Napropamide Risk Summary	20, Table 6 header	Correct the spelling of "summary".	corrected in the revised document
2.1.3.2 Napropamide Risk Summary	20, Table 6	Last row: there is no footnote 1 found in the body of the table. Footnotes 2 and 6 are	corrected in the revised document

Header	Page and Location	Registrant Error Correction Comments	HED Response
		missing at the end of the table.	
2.1.3.2 Napropamide Risk Summary	21, Table 6	The footnote might read better as “Inhalation risk assumes no respirator used by handlers” as is found in the HED Chapter (D308278, page 51).	Corrected in the revised document.
3.1.2 Data and Assumptions for Handler Exposure Scenarios	24, Bullet 1	It is not clear why in this assessment the PHED data for aerosol can is used to assess pump - trigger sprayer applications. There are no home-owner uses of napropamide that require pump-trigger spray applications.	corrected in the revised document
3.1.2 Data and Assumptions for Handler Exposure Scenarios	24. last paragraph	The last sentence should be corrected to refer to section 2.1.1.2.	corrected in the revised document
3.2.3 Residential Postapplication Exposure and Risk Estimates	28	SA units should be corrected to <u>cm</u> ² .	corrected in the revised document
3.2.3 Residential Postapplication Exposure and Risk Estimates	30, Table 8	Footnote b should be corrected to “Target MOE is <u>100</u> .”	corrected in the revised document
Appendix A Short and Intermediate Term Inhalation Risk	Table A1	The footnote for the header in column 2 should be footnote 1, not footnote 2.	corrected in the revised document