

SC-330

COMMISSIONER OF FOOD AND DRUGS

August 20, 1969

Albert Rothschild
Petitions Control Branch, SC-13

RH-315 -- Pesticide Petition No. 960821

BRIEFING MEMORANDUM
Eckman and Kass Company
Philadelphia, Pennsylvania
AF 24-037

RH-315 is the trade name for the herbicide 3,5-dichloro-m-(1,1-dimethyl-2-propynyl)benzamide. There are no tolerances established for this compound. This petition, as amended, requests the establishment of temporary tolerances for residues of RH-315 and its metabolites calculated as the parent compound in alfalfa, clover, lespedeza, trefoil, and vetch at 3 parts per million; lettuce at 1 ppm; in kidney and liver at 0.2 ppm (negligible residue); and in milk at 0.01 ppm (negligible residue).

The Pesticides Regulation Division, USDA, has advised us that they are prepared to issue a temporary permit to provide for the use of 6,487.5 pounds of the active ingredient. The Fish and Wildlife Service, USDI, has no objection to the proposed tolerance.

The Division of Pesticides finds that:

1. The residue is adequately identified.
2. An adequate analytical method is available for enforcement.
3. Residues from the proposed uses will not exceed the proposed temporary tolerances.
4. There is no reasonable expectation for residues to occur in edible tissues (other than liver and kidney) of livestock from the proposed uses (category 3 of section 120.6a).
5. There is no reasonable expectation of residues in eggs because of the very small amount of alfalfa included in poultry rations.

SEP 3 1969

- 2 -

6. Residues in follow-up crops resulting from the proposed uses of this temporary tolerance will not be a problem.

The Division of Pharmacology and Toxicology finds the proposed temporary tolerances are safe and will protect the public health. They concern the 0.2 ppm in kidney and liver, and 0.01 ppm in milk are negligible residues.

We recommend the attached letter be signed and notice be published.

APPROVED:

F. J. McFarland, Chief
Petitions Control Branch
Bureau of Science

L. L. Ramsey, Asst. Director
for Regulatory Programs
Bureau of Science

cc: SC-13(2) SC-330 SC-970 CC-30 CC-1

ARothschild:mmm 8.19/69; ctb 7/15/69

R/D Init:GJBeusch 7/22/69
JAipert 7/24/69
OGFitzhugh 8/8/69
WStokes 8/11/69
DMBaker 8/11/69