

9/7/93

MEMORANDUM

SUBJECT: PPOF3834. Quizalofop ethyl (ethyl 2-[4-(6-chloro-quinoxaline-2-yl-oxy)phenoxy]propanoate) on lentils, dried peas, dried beans. DP Barcode D189818. CBTS No. 11705.
EPA Reg. No. 352-441. duPont 'Assure' Herbicide. DP Barcode D189818. CBTS No. 11706,
EPA Reg. No. 352-541. duPont 'Assure II' Herbicide. DP Barcode D189820. CBTS No. 11707.

FROM: R. W. Cook, Chemist.
Tolerance Petition Section I
CBTS/HED (H7509C)

THRU: Debra Edwards, Ph.D., Chief
CBTS/HED (H7505C)

TO: R. Taylor, PM 25
Fungicide-Herbicide Branch
Registration Division (H7505C)

and

Albin Kocialski
Chemical Coordination Branch, HED (H7509C)

Deficiencies Outstanding

None.

Conclusions:

1. We have previously concluded that the metabolism of quizalofop ethyl in plants is adequately understood for the purpose of the proposed tolerance. The residue of concern is quizalofop ethyl (ethyl 2-[4-(6-chloroquinoxaline-2-yl-oxy)phenoxy]propanoate) and its metabolite 2-[4-(6-chloroquinoxaline-2-yl-oxy)phenoxy]propanoic acid.

2. We have previously concluded that adequate analytical methods are available in PAM II for the enforcement of the proposed tolerance in lentils. Tolerance requests for dried beans and peas have been withdrawn.
3. We have previously concluded that residues of quizalofop ethyl (ethyl 2-[4-(6-chloroquinoxaline-2-yl-oxy)phenoxy]propanoate) and its metabolite 2-[4-(6-chloroquinoxaline-2-yl-oxy)phenoxy]propanoic acid in lentils will not exceed the proposed tolerance from the proposed use, provided a 60 day preharvest interval is observed.
4. With the lentil vine and hay feeding restriction, we conclude that secondary residues will not occur in livestock feed items, and therefore no residues are expected in meat, milk, poultry, or eggs.
5. We have previously concluded that there are no compatibility problems associated with this petition in terms of Codex, Canadian, or Mexican maximum residue limits.

Recommendations

TOX considerations permitting, we recommend for the proposed tolerance of 0.05 ppm for residues of quizalofop ethyl (ethyl 2-[4-(6-chloroquinoxaline-2-yl-oxy)phenoxy]propanoate) and its metabolite 2-[4-(6-chloroquinoxaline-2-yl-oxy)phenoxy]propanoic acid, all expressed as quizalofop-p ethyl ester, in or on lentils. Supplemental labeling for EPA Reg. No. 352-441 and EPA Reg. No. 352-451 comply with the proposed Section B.

Background

In our previous consideration of subject petition, the proposed raw agricultural commodities included lentils, dried peas, and dried beans. A revised Section F has been submitted and requests tolerances on lentils only. Telecom (9/3/93 between Vickie Walters, RD, and R. W. Cook, HED) confirmed that the petitioner has withdrawn previously requested tolerances on dried beans and peas.

In addition, the expression of the tolerance in the new Section F has been revised to include the S enantiomers of quizalofop ethyl (ethyl 2-[4-(6-chloroquinoxaline-2-yl-oxy)phenoxy]propanoate) and its metabolite 2-[4-(6-chloroquinoxaline-2-yl-oxy)phenoxy]propanoic acid, all expressed as quizalofop-p ethyl ester, as specified in 40 CFR 180.441(c).

DETAILED CONSIDERATIONS

Previous deficiency 2(b): No raw data and/or chromatograms were submitted with this petition. Due to the complexity of the methodology, representative copies of the raw data and/or chromatograms are required to be submitted for review.

Representative copies of raw data and chromatograms have been submitted. Since we have concluded that adequate analytical methods exist for lentils, and since beans and peas have been withdrawn for this petition, we will review the submitted raw data and chromatograms at such time as the petitioner submits a new petition for tolerance.

Previous deficiency 3(a): The submitted residue data are adequate only for a PHI of 60 days. The proposed 30 day PHI is inadequate. A revised Section B is required increasing the proposed PHI for lentils.

A revised Section B specifies a preharvest interval of 60 days; the 60 day preharvest interval is also reflected in the supplemental labeling to EPA Reg. No. 352-441 and EPA Reg. No. 352-541. This deficiency is resolved.

Previous deficiency 4(a): No residue data were submitted for lentil vines and hay. Lentil vines and hay are considered minor feed items. Unless the petitioner submits residue data for lentil vines and hay, a revised Section B is required with a feeding restriction for lentil vines and hay.

A revised Section B specifies a feeding restriction "do not feed vines or hay." The feeding restriction is also reflected in the supplemental labeling to EPA Reg. No. 352-441 and EPA Reg. No. 352-541. This deficiency is resolved.

cc: Circ., R.F., PPOF3834, R. W. Cook.
H7509C:Reviewer:RWCook:rcw:9/3/93:9/7/93:Rm810H:CM2
RDI:Sect Head:RSQuick:9/3/93:RALoranger:9/3/93:DEdwards:9/3/93.