



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

R.F.
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OFFICIAL RECORD
HEALTH EFFECTS DIVISION
DATA REVIEWS

FEB 21 1996

OFFICE OF
PREVENTION, PESTICIDES, AND
TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: PP#4F04322. Tribenuron Methyl in or on Grass Grown for Seed. Amendment of 11/6/95. MRID# none. Barcode D221078. CBIS# 16526.

FROM: G.F. Kramer, Ph.D., Chemist
Tolerance Petition Team I
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Health Effects Division (7509C)

THRU: E. Zager, Acting Branch Chief
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TO: JoAnne Miller, Product Manager
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And

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Health Effects Division (7509C)

Du Pont has proposed tolerances for the sulfonyl urea herbicide tribenuron methyl (methyl 2-[[[N-(4-methoxy-6-methyl-1,3,5-triazin-2-yl)methylamino]carbonyl]amino]sulfonyl]benzoate) in/on grass grown for seed. Tolerances, expressed as the parent compound only, are currently established under 40 CFR § 180.451 for barley grain (0.05 ppm), barley straw (0.10 ppm), wheat grain (0.05 ppm) and wheat straw (0.10 ppm). The registrant is now proposing the following tolerances for tribenuron methyl (expressed as the parent compound only):

Hay of the grass forage, fodder and hay group (excluding Bermuda grass) -- 0.10 ppm

Forage of the grass forage, fodder and hay group (excluding Bermuda

grass) -- 0.10 ppm
 Forage Regrowth -- 0.10 ppm

The current amendment addresses deficiencies identified in CBTS's previous review (Memo, G. Kramer 9/18/95).

CONCLUSIONS/RECOMMENDATIONS

The requested revisions to Sections B & F have been made. CBTS now recommends in favor of the proposed tolerances of 0.10 ppm for residues of tribenuron methyl on grass RACs. The tolerance on forage regrowth is not required. This deletion can be made administratively.

As no tolerances are being established or increased in any human food item, a DRES run is not required for this petition.

DETAILED CONSIDERATIONS

Deficiency - Conclusion 2 (from Memo, G. Kramer 9/18/95)

2. The directions for use of tribenuron methyl on grasses are not adequate. The registrant must specify a minimum application volume for ground applications. Also, a PHI for grazing and hay cutting should be provided. A revised Section B is required.

Petitioner's Response: A revised label in which a PHI of 60 days is specified for all RACs and minimum spray volumes of 10 and 2 gal/A are specified for ground and air applications, respectively.

CBTS's Conclusion: The requested label revisions have been provided. This deficiency is now resolved.

Deficiency - Conclusions 6b, 6d-f (from Memo, G. Kramer 9/18/95)

6b. This petition is for a group tolerance; i.e., the grass forage, fodder and hay group. The product label restricts use to seed crops. CBTS concludes that the submitted residue data are deficient in that: i) the three representative commodities of the grass forage, fodder and hay group (Bermuda grass, bluegrass and bromegrass or fescue) were not represented; ii) the geographic representation is inadequate; iii) the number of field trials is not sufficient; and iv) no data on grass forage and hay were reported.

6d. The proposed tolerances in Section F are also not acceptable. Tolerances must be proposed for all grass RACs and be worded to reflect a group tolerance.

The appropriate tolerances for this petition are thus: "Forage of the grass forage, fodder and hay group and Hay of the grass forage, fodder and hay group." Tolerances for grass straw and seed screenings are not required since Table II (Sept. 1995) does not list these items as significant livestock feeds. A revised Section F is required.

6e. CBTS notes that Bermuda grass is a very minor seed crop and that the Express label has no directions for use on Bermuda grass. If the registrant does not wish to perform Bermuda grass trials, then a bluegrass or fescue trial in MN and a wheatgrass, bluegrass or bromegrass trial in MT may be substituted. Replacement of the CA trial with MN and MT trials would increase the geographic representation to 77%. If the registrant chooses not to perform a Bermuda grass trial, then the proposed tolerances should be expressed as: "Hay of the grass forage, fodder and hay group (excluding Bermuda grass); Forage of..." Also, the Express label should be revised to specifically restrict use on Bermuda grass.

6f. CBTS would consider a tolerance request for tribenuron methyl in/on grass RACs, accompanied by an application for regional registration (OR, WA and ID only) of Express Herbicide, based on geographically limited field trial data, if one of the following criteria is met:

- (i) The Biological and Economic Analysis Division (BEAD) concludes that "...there is little likelihood of use of the pesticide outside the geographically limited area" (FR 51:63, 4/2/86), based on the known range of the problem or the lack of economic importance of the problem outside the geographically limited area;

OR,

- (ii) BEAD concludes that the geographically limited use will meet the economic criteria for tolerance fee waivers, also described in FR 51:63, 4/2/86 (see Anne Lindsay memo of 7/7/93 on Policy for Regional Registration).

If BEAD determines that a regional registration is appropriate for this petition, then the field trial data requirements will be determined in accordance with Attachment 11 of EPA Guidance on Number and Location of Domestic Crop Field Trials for Establishment of Pesticide Residue Tolerances, 6/2/94. The states of OR, WA and ID together account for 37.4% of the U.S. seed grass acreage and 12 field trials are required for a national registration. Thus, a total of five acceptable trials (12 X 0.37), including multiple year data and a residue decline study, would be required for regional registration. Since the submitted trials were not fully acceptable (single year, no residue decline study), CBTS would normally require additional trials to be conducted. However, as data are available for closely related crops (wheat and barley), no further trials would be required. Since residues were not found in the straw at harvest, residues in forage and hay from regrowth are unlikely. The tolerances for these RACs should be set at the LOQ of the enforcement method (0.10 ppm).

Petitioner's Response: A revised label in which use on Bermudagrass is prohibited. A revised Section F proposing the following tolerances:

Hay of the grass forage, fodder and hay group (excluding Bermuda grass) -- 0.10 ppm

Forage of the grass forage, fodder and hay group (excluding Bermuda grass) -- 0.10 ppm

Forage Regrowth -- 0.10 ppm

CBTS has been instructed that this proposed use qualifies for regional registration (E. Wilson, Data Review Instructions as specified on D221078, the present submission).

CBTS's Conclusion: The requested label and tolerance revisions have been provided. However, the appropriate tolerances are:

Grass forage, fodder and hay group (except bermudagrass);
hay -- 0.10 ppm

Grass forage, fodder and hay group (except bermudagrass);
forage -- 0.10 ppm

A tolerance on forage regrowth is not required. These revisions can be made administratively. This deficiency is now resolved.

cc: PP#4F04322, Kramer, Circ., R.F.
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