

DATE: December 7, 1979.

SUBJECT: PP#8F2106; Propanil on Wheat; Addendum to 5/16/79 memorandum.  
CASWELL #325

FROM: William Dykstra *C. Frick*  
Toxicology Branch (TS-769) *WDD 12/11/79*

TO: Robert Taylor  
Toxicology Branch (TS-769)

THRU: Dr. Adrian Gross, Chief *William Dykstra for M. Adrian Gross*  
*Toxicology Branch (TS-769)*  
Recommendation:

1. An acceptable teratology study is required to support the proposed tolerances. The reason for this requirement at this time is that the "negligible residues" (0.05 ppm) in or on wheat grain and wheat straw have been revised in the Section F of the petition to 0.20 ppm and 0.75 ppm in or on wheat grain and wheat straw respectively. Tolerances have been established under 40 CFR 180.274 for propanil and its metabolites without teratology, but consideration should be given to the food factor of 10.36% to the human diet for wheat. In addition, current tolerances have a TMRC of 0.0609 mg/day/1.5 kg and the requested tolerances will alone result in a TMRC of 0.03108 mg/day/1.5 kg which represents a 33% increase in exposure.

TOX/HED:th:RD Initial WWOODROW:12-5-79

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