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

JAN 31 1991

OFFICE OF  
PESTICIDES AND TOXIC  
SUBSTANCES

**MEMORANDUM**

SUBJECT: Uniroyal Chemical Co.: Reregistration of Naptalam:  
Request for Waiver of Animal Metabolism Data  
Requirements (No MRID; DEB No. 7270)

FROM: William O. Smith, Ph.D., Chemist *William O. Smith*  
Reregistration Section  
Chemistry Branch II-Reregistration Support  
Health Effects Division (H7509C)

THROUGH: William Boodee, Section Head  
Reregistration Section  
Chemistry Branch II-Reregistration Support *W.B.*  
Health Effects Division (H7509C)

TO: S. Cerelli, PM Team 74  
Reregistration Branch  
Special Review & Reregistration Division (H7508C)

**BACKGROUND**

Naptalam is registered for use as a herbicide on soybeans and peanuts, which are livestock feed items.

The Naptalam Reregistration Guidance Document (3/85) concludes that the qualitative nature of the residue in animals is not adequately delineated and requires data on ruminant and poultry metabolism, unless the registrant can show that there are no detectable residues in animal feeds by a sensitive method, or that practical restrictions can be imposed on the use of naptalam which will preclude from animal feeds detectable residues of concern.

Uniroyal Chemical Company has requested a waiver of livestock metabolism requirements because no detectable residues occur in seeds of soybeans and peanuts and current labels restrict the feeding of treated foliage to livestock.

**RECOMMENDATION**

It is current CBRS policy that livestock (poultry and ruminant) metabolism studies are required whenever an animal feed item is



involved, regardless of whether detectable residues are observed (see memorandum of R.D. Schmitt, 7/25/89, Guidance on When and How to Conduct Livestock Metabolism Studies). CBRS strongly recommends that the registrants request for waiver be denied.

cc: W. Smith, Naptalam Reg. Std. File, Naptalam Subject File, RF, C. Furlow (PIB/FOD), Janet Burrell (PIB/FOD).

H7509C:CBRS:WOS:wos:Rm812D:CM#2:X4353:01/31/91  
RDI: RP:01/31/91:WB:01/31/91:EZ:01/31/91