trifluralin

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Proposed Section 18 Exemption for the use of
triflualin on rapeseed.

John Worthington, Chemist, Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

ERS (H. Jamerson) and Toxicology Branch

THRU: Acting Chief, Residue Chemistry Branch

The Department of Natural Resources of the State of Alaska is proposing an exemption under Section 18 of FIFRA to allow the emergency use of trifluralin on rapeseed for the control of various weeds. A single preplant incorporated treatment is to be made at rates of 0.5-1 lb a.i./acre. A maximum of 1000 acres are to be treated. Essentially the same use was proposed by North Dakota for the 1978 growing season and was commented on by this branch on 6/29/78 (see Dr. R.J. Hummel's memo).

Residue data for rapeseed are available from several Canadian studies. Following preplant incorporated treatment with trifluralin at rates of 0.5-2 lb act/A (0.5-2X the maximum proposed rate), do detectable residues of trifluralin (<0.01 ppm) were found on harvested rapeseed. A single residue study was submitted for rape straw. Preplant incorporated treatment at rates of 1, 1.5 and 2X the maximum proposed rate resulted in straw residues of <0.01, <0.01 and 0.03 ppm. No data are submitted for rape forage.

No processing study for rapeseed is submitted. However, since no detectable residues were found in rapeseed after exaggerated treatments, it is unlikely that there will be detectable residues in the processed commodities derived from rapeseed.

The proposed treatment is unlikely to result in detectable residues of trifluralin in either rapeseed, rape straw or the processed commodities derived from rapeseed. In the absence of data, a restriction against the grazing or cutting of treated forage is needed to preclude residues in meat and milk.

Recent batches of Treflan EC contain an average of [redacted] ppm N-nitrosodipropylamine (NDPA). We would not expect the use of Treflan on rape to result in any residues of NDPA in rapeseed or rape straw. In fact, in the unlikely event that all the applied NDPA were to be taken up by the plants and translocated to the seed, calculated residues on harvested rapeseed would only be [redacted] ppb.

MANUFACTURING PROCESS INFORMATION IS NOT INCLUDED

Conclusions and Recommendations

1. Residues of trifluralin in rapeseed, rape straw and the processed commodities derived from rapeseed will be nondetectable (<0.01 ppm).

2. The proposed use of trifluralin on rape is unlikely to result in residues of N-nitrosodipropylamine in rapeseed or rape straw.

3. A label restriction against the grazing or feeding of treated forage to livestock is needed to preclude residues in meat and milk.

Provided that a label restriction against the grazing or feeding of treated forage to livestock is added and some administrative agreement regarding the legal status of treated rapeseed is made with FDA, there are no RCB objections to the proposed Section 18 exemption.

John M. Worthington

cc: trifluralin SF, Sec. 18 SF, Circu., RF, JMW
TS-769:JMWORTHINGTON:mer:Rm 108:WSME:X62610:3/20/79
RDI:ARRATHMAN:3/19/79:RDSCHMITT:3/19/79