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

APR 4 1984

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Methyl Bromide Data Call-in

FROM: Ed Zager, Chemist
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

Edward Zager

THRU: Charles L. Trichilo, Chief
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

TO: Geraldine Werdig
Data Call-in
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Because of recent findings of residues of ethylene dibromide in foods the existing exemptions from tolerances for methyl bromide will be reevaluated. Consequently, in order to characterize the nature and levels of methyl bromide residues in treated commodities, processing fractions derived from them and the possible transfer of residues to meat, milk, poultry and eggs the following information will be needed.

1. Product Chemistry Data as specified in the Pesticide Assessment Guidelines, Subdivision D and the Proposed Data Requirements, part 158.120.

2. Residue Chemistry Data as specified in the Pesticide Assessment Guidelines, Subdivision O, with section indicated below, and the Proposed Data Requirements, part 158.125.

a. Section 171-4(a) - Appropriate metabolism/degradation studies (in plants) using radiolabeled methyl bromide are needed to determine the nature of the residue in or on treated commodities.

b. Section 171-4(b) & (c) Appropriate residue data must be developed to determine the levels of residues (methyl bromide per se and metabolites of toxicological concern) that remain in all commodities for which there are registered uses. Residue data should be obtained at various times after treatment to determine the decline in residue levels with time. The studies should reflect the effects of parameters such as time of exposure,

dosage, temperature, pressure, geometry and airtightness of the container upon residue levels. The effect of aeration time and other procedures upon residue reduction should be demonstrated. All residue data should be obtained by adequately validated analytical methodology and utilize commercial or similar large scale equipment.

c. Section 171-4(c)2(iv)a If the above residue studies show that detectable residues are found in treated commodities, then registrants must also develop and submit processing studies showing the dissipation of residues upon processing (such as milling, cooking, baking, etc.) of such commodities containing residues.

d. Section 171-4(a)3 If the above residue studies show detectable levels of methyl bromide or metabolites of toxicological concern in treated commodities which could be used as feed items, then registrants must also: develop and submit appropriate animal metabolism studies using radiolabeled methyl bromide.

e. Section 171-4(c)3 If detectable residues of methyl bromide per se are found in livestock feed items then registrants must also develop and submit conventional ruminant and poultry feeding studies. Such studies should be designed to yield data on the possibility of secondary residues of methyl bromide or its metabolites in meat, milk, poultry or eggs.

cc: Methyl Bromide S.F.
RF
Circu
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