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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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OPP OFFICIAL RECORD
HEALTH EFFECTS DIVISION
SCIENTIFIC DATA REVIEWS
EPA SERIES 361OFFICE OF
PREVENTION, PESTICIDES, AND
TOXIC SUBSTANCES

SUBJECT: Propazine (080808), Proposed New Use on Sorghum.
Registrant Griffin Corporation.
Residue Chemistry Requirements.
CBRS No. 17214,
DPBarcode Nos. D226108 (RD), D226191 (RCAB); No MRID.

FROM: John Abbotts, Chemist *John Abbotts*
Special Review Section I
Chemistry Branch II - Reregistration Support
Health Effects Division [7509C]

THRU: Andrew R. Rathman, Section Head *AR*
Special Review Section I
Chemistry Branch II - Reregistration Support
Health Effects Division [7509C]

TO: Kathryn Boyle
Special Review and Registration Section
Risk Characterization and Analysis Branch
Health Effects Division [7509C]

and Terri Stowe, PM Team 25
Fungicide-Herbicide Branch
Registration Division [7505C]

Registrant Griffin Corporation has submitted its understanding of specific residue chemistry requirements relevant to a proposed new use on sorghum (Letter of 4/10/96 from L.V. White, Griffin, to T. Stowe, EPA). The Registrant's letter was based on a meeting with Dr. William Tweedy, consultant to the Registrant, and OPP representatives on 2/27/96, and subsequent telephone conversations discussing a draft of the letter between Dr. Tweedy and this reviewer on 4/11/96. Assignment instructions are to review the Registrant's letter to determine if it adequately reflects the CBRS position. A high priority review was requested.

CBRS has no substantive disagreement with the Registrant's letter. We make the following comments on specific numbered paragraphs in the letter for clarification:

Propazine, Registrant Letter, p. 2 of 2

1. We have advised the Registrant's consultant of information in the triazine PD1 (59 FR 60412, 11/23/94) indicating that transfer ratios, residues in tissues:residues in feed, were significantly higher for atrazine parent than for some atrazine metabolites. Extrapolating this information to propazine would indicate that if a metabolism study at low feeding levels of hydroxypropazine produced residues in tissues below the limits of detection, transfer ratios that would be used in exposure assessment could be artificially high. Feeding levels considerably higher than 10 ppm hydroxypropazine could be to the Registrant's advantage, if goats can tolerate the higher levels.

2. "No additional metabolism" work on poultry should be understood to refer to a provisional decision by CBRS that a hydroxypropazine poultry metabolism study would not be required, based on the Registrant's preliminary information that total radioactive residues (TRR) in poultry tissues from the propazine metabolism study will be less than 0.01 ppm, translated to a 1X feeding level.

We recommend that a copy of this memo be provided to the Registrant.

cc:Abbotts, RF, Propazine List A File, SF
RDI:ARRathman:5/23/96:RBPerfetti:5/23/96:EZager:5/24/96
7509C:CBII-RS:JAbbotts:CM-2:Rm805A:305-6230:5/28/96
■JA17\propazin.4



April 10, 1996

Ms. Theresa Stowe (PM-22) (AMEND)
U. S. Environmental Protection Agency
401 M. Street, S. W. (H7505C)
Washington, D. C. 20460

Subject: Memorandum of Understanding

Dear Terri:

Thank you for setting up the February 27, 1996 meeting between Bill Tweedy and members of the Residue Chemistry Branch. I sincerely appreciate your effort. Bill told me the meeting was very productive. As a result of the understanding reached at this meeting, he expects we will be able to submit in a high quality data package in support of our Propazine registration, one that will require less time for review and approval.

In the following paragraphs, I have summarized the agreements reached at the February 27 meeting and in subsequent telephone discussions with John Abbotts.

1. Two goat metabolism studies will be conducted to investigate the transfer of propazine residues into meat tissues and milk. One goat will be dosed with [^{14}C (U)]-s-triazine labeled Propazine and a second goat will be dosed with [^{14}C (U)]-s-triazine labeled 2-hydroxy-Propazine. The level of the dose to be administered will be a minimum of 10 ppm in the feed for each study. Tissues and milk from the goat dosed with parent Propazine will be qualitatively and quantitatively analyzed for propazine, desethyl-atrazine (G-30033), 4,6-diamino-2-chloro-s-triazine (G-27283), 2-hydroxy-propazine, 2-hydroxy-desethyl-atrazine and ammeline. Tissues and milk from the goat dosed with 2-hydroxy-propazine will be qualitatively and quantitatively analyzed for the three hydroxy metabolites. Total Radioactive Residues (TRR) will be determined for all tissue and milk samples.
2. A poultry metabolism study using [^{14}C (U)]-s-triazine labeled propazine will be conducted and the tissues and eggs will be analyzed for the same metabolites identified for the goat study dosed with Propazine. No additional metabolism work will be required for satisfying the poultry section of the petition providing these studies are of acceptable quality.
3. Samples collected from the field sorghum residue program will be analyzed for propazine and the two chloro metabolites. It was pointed out that assaying for the more important hydroxy

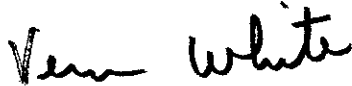
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metabolites in the sorghum samples could be to Griffin's advantage if it were later determined that the hydroxy metabolites would be required as a part of the tolerance.

Terri, I believe these conclusions accurately reflect the discussions and agreements that Bill had with you and members of the Residue Chemistry Branch. Please either confirm the approaches to the three above issues or let me know of any disagreements.

Again, thank you so much for your cooperation. I look forward to your reply.

Sincerely yours,
GRIFFIN CORPORATION

A handwritten signature in cursive script that reads "L. Vernon White".

L. Vernon White, Manager
Herbicide Registration

CC: Dr. Bill Tweedy
Dick Feulner



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Chemical:	Propazine
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HED File Code	11000 Chemistry Reviews
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