

May 18, 1971

PP #1F10~~24~~. Daconil on various crops. Comments on method tryout.

Petitions Control Branch
and Toxicology Branch

We have received an informal report from MIS/CB on the method tryout for residues of Daconil and its hydroxy-metabolite on peanuts and broccoli.

The recovery results are as follows:

	<u>Peanuts</u>		<u>Broccoli</u>	
	<u>Dac</u>	<u>OH-Dac</u>	<u>Dac</u>	<u>OH-Dac</u>
Blanks	<0.02 ppm	<0.02 ppm	<0.02 ppm	<0.02 ppm
0.3 ppm	87,93%	90,100%	-----	-----
0.6 ppm	87,83%	100,95%	-----	-----
2.5 ppm	-----	-----	88,100%	80,100%
5 ppm	-----	-----	94,100%	80,92 %

Based on these results, we conclude that the petitioner's ECGC method is adequate for enforcement of the proposed tolerances. A nitrogen-sensitive detector GC procedure is available for confirmatory purposes. We now recommend that the presently proposed tolerances³ be established, if pharmacological considerations permit.

NOTES: (1) As indicated in our last review of this petition (memo of W. S. Cox, 5/6/71), the correct names for Daconil and its hydroxy-metabolite are not currently used in the Regulations. We defer to PCB as to the desirability of correcting this situation.

(2) Mr. Puma of MIS/CB reports that the petitioner's method for residues in peanuts is satisfactory for use with the ECGC detector, but that, as written, it would not be satisfactory for use with the MCGC detector reportedly used by the petition^{er} in obtaining the original residue data for peanuts. This is due to the fact that the amount of oil left after final cleanup would make it impossible to inject an appropriate aliquot

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into a microcoulometric gas chromatograph. This consideration casts some doubt on the validity of the original residue data if the method was applied in the residue experiments exactly as written.

However, since we have adequate data to show that Daconil and its metabolite do not translocate, this will be a "no-residue" situation for peanuts (edible seed). Thus, the important point is that it has been demonstrated that the petitioner's ECGC method is adequate for enforcement of the proposed tolerances.

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5/18/71
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5/17/71 5/17/71