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

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

JUN 15 1989

MEMORANDUM

SUBJECT: EPA Reg. Nos. 352-382 and 352-390. Metribuzin. Rotational Crop Accumulation Study. Deferral from EFGWB. MRID No. 405777-01. DEB Nos. 5156 and 5157.

FROM: Linda S. Propst, Chemist
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THRU: Andrew R. Rathman, Section Head
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TO: Robert J. Taylor, PM #25
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and
Toxicology Branch
Health Effects Division (H7509C)

E.I. du Pont de Nemours & Co., Inc. has submitted a rotational crop accumulation study for metribuzin in an attempt to reduce the existing 12-month rotation restriction for peanuts to 8 months.

Environmental Fate Ground Water Branch has reviewed this study and concluded (A. Reiter, 12/21/88) that soils residues of radiolabeled metribuzin were not detectable (<0.004 ppm) for the 8 month rotational intervals at exaggerated (1.8X) rates. Likewise, the total ^{14}C residues were very low (0.06 ppm). The levels in the nut meat and shell were 0.027 ppm and 0.066 ppm, respectively, and would be expected to be even lower if the label (vs. exaggerated) rate were used. However, approximately 0.6 ppm levels of incompletely characterized radiolabeled material were found in the foliage portions of peanuts after an 8 month interval.

Environmental Fate Ground Water Branch has asked Dietary Exposure Branch if peanut foliage is a feed item and if Dietary Exposure Branch can support this 8 month interval because of the residues on foliage.

Conclusions and Recommendations

Dietary Exposure Branch considers peanut foliage a feed item and therefore, in this case, a rotational crop tolerance will be required.

However, if Toxicology Branch does not consider the terminal polar compounds that constitute the major portion of the foliage residues to be toxicologically significant, no tolerance will be required.

cc: Reading File, Circulation, Subject File, Reviewer, Branch Chief, PMSD/ISB
RDI: A. R. Rathman, 6/14/89; E. Zager, 6/15/89
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