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

APR 20 1982

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

Subject: FAP#1H5310. Glyphosate on tea.
Amendment of 3/18/82.

From: Karl H. Arne, Ph.D, Chemist *KH Arne*
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

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

To: Robert Taylor, Product Manager No. 25
Herbicide-Fungicide Branch
Registration Division (TS-767)

and

Toxicology Branch
Hazard Evaluation Division (TS-769)

In our review of this petition (12/18/81) we recommended against the proposed tolerances. For a favorable recommendation we required the following:

1. Residue data for green tea.
2. The petitioner should inform us as to which countries the use on tea is intended and assure us that the use in Section B is the one they intend to propose for registration in those countries where residue data were generated. Additionally, the petitioner should provide us with information on the pesticide registration procedures in the countries where use is intended (Note: We already have information on the registration act in India).

With this amendment the petitioner has informed us that the previously submitted tea residue data from Taiwan were for green tea. The critical difference between green and black tea is a fermentation step; black tea is fermented, green tea is not. Tea from China is not fermented, therefore the residue data from Taiwan is for green tea. The studies from Taiwan show that no more residue is expected in green tea than in black tea. This deficiency is resolved.

As we requested the petitioner has indicated which countries in which this use is to be registered. These are India, Sri Lanka and Taiwan. The requested information on pesticide registration in Sri Lanka and Taiwan has not been submitted but is forthcoming. Resolution of deficiency 2 awaits this submission.

Also submitted is a Revised Section F in which food additive tolerances are proposed for tea (1 ppm) and instant tea (4 ppm). The original Section F had not indicated that the tolerance proposed for tea was a food additive tolerance.

Recommendation

We recommend against the proposed tolerances. Further consideration awaits submission of information on the pesticide registration procedures in Sri Lanka and Taiwan.

Note to the P.M.: When the 1 ppm tolerance to tea is established, it should be in terms of dried tea.

TS-769:RCB:K.H.Arne:MCH:CM#2:RM810:X77377:4/16/82
cc: RF, Circu., K. H. Arne, Thompson, TOX, EEB, EFB, FDA,
FAP#1H5310
RDI: Quick, 4/14/81; Schmitt, 4/14/82

File last updated: 3/23/82

NOCTURNAL BATTERY DATA SUMMARY

Material	Ref.	Yield	PPH
10/85	100	0.300	1.0000

Published Tolerances

Crop	Tolerance	Food Factor	mg/day (1.5kg)
Grain crops (42)	0.100	13.75	0.00000
Avocado (6)	0.200	0.03	0.00000
Citrus fruits (33)	0.200	3.81	0.01144
Coffee (30)	1.000	0.75	0.01119
Cucurbit, loc. raising (60)	0.100	6.00	0.00074
Leafy Vegetables (50)	0.200	2.75	0.00022
Legumes (101)	0.050	0.10	0.00031
Pome fruits (126)	0.200	2.75	0.00037
Root Crop veg (130)	0.200	11.00	0.00299
Seedling veg (143)	0.050	3.66	0.01092
Soybeans (151) (152)	0.100	0.92	0.00267
Sale oil (201)	0.050	0.03	0.00005
Historic nuts (211)	0.200	0.03	0.00000
Asparagus (7)	0.200	0.14	0.00043
Peanuts (7)	0.200	1.41	0.00028
Olives (107)	0.100	0.06	0.00009
Stone fruits (151)	0.200	1.25	0.00037
Sugar, cane/beet (154)	2.000	3.64	0.10515
Malasses (16)	20.000	0.03	0.00020
Cranberries (44)	0.200	0.13	0.00009
Cottonseed (oil) (41)	15.000	0.15	0.00037
Kidney (203)	0.500	0.03	0.00023
Liver (211)	0.500	0.03	0.00023
Peanuts (115)	0.100	0.36	0.00054
Guava (165)	0.200	0.03	0.00009
Peapayas (100)	0.200	0.13	0.00009
Mangoes (88)	0.200	0.03	0.00009

ADI	THRC	% ADI
1.0000 mg/day (60kg)	0.3498 mg/day (1.5kg)	19.43

unpublished, tox Approved: 1F2163, 2J29, 905204, 1E2444, 1G2440, 2F2634

Crop	Tolerance	Food Factor	mg/day (1.5kg)
Cucurbits (49)	0.100	2.84	0.00426
Fruiting Vegetables (60)	0.100	2.99	0.00440
Small fruit, berries (140)	0.100	0.63	0.00124
Beans (73)	0.100	0.13	0.00005
Fish, shellfish (59)	2.000	1.08	0.03250
Potable water (193)	0.500	133.33	1.00000
Pineapple (123)	0.100	0.30	0.00044

ADI	THRC	% ADI
1.0000 mg/day (60kg)	1.3923 mg/day (1.5kg)	77.36

Current action 7-14 145310

CROP Tolerance Food Factor mg/day (1.5kg)
Tea (162) 4.000 0.17 0.00425

HP1 TDFC 3 ADI
1.8000 mg/day (60kg) 1.3971 mg/day (1.5kg) 77.61
