

25 MAR 1981

Memorandum

SUBJECT: PP#OF2416. Metolachlor on sunflowers. Amendment of 3/2/81.

FROM: K.H. Arne, Ph.D., Chemist
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TO: Richard Mountfort, Product Manager
Team No. 23, Registration Division (TS-767)
and
Toxicology Branch
Hazard Evaluation Division (TS-769)

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

In our review of the subject petition (2/14/81) we recommended against the proposed tolerance. For a favorable recommendation we required:

1. A revised Section F in which feed additive tolerances of 0.6 ppm are proposed for sunflower meal and hulls. A tolerance of 0.3 ppm for sunflower seeds rather than sunflowers, should be included in the revised Section F.
2. The imposition of a label restriction that prohibits the use of any metalachlor treated sunflower forage as livestock feed.

The petitioner has submitted a revised Section F which includes the requested changes. This deficiency is satisfied.

With regard to the second deficiency the petitioner has pointed out that the proposed label includes the requested feeding restriction in the Rotational Crop section of the label. This point is resolved.

Recommendation

Toxicological considerations permitting, we recommend for the proposed tolerances as discussed above.

For the sake of clarity, we recommend that the label feeding restriction be removed from the Rotational Crop section of the label and be placed separately (as it now reads it is implied that the label feeding restriction applies only to rotational crops; it should be made clear that this restriction applies to any sunflower forage grown in fields treated with metolachlor).

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