

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

SUBJECT: PP No. 5F1606, CGA-24705 on corn.
Amendment of 3/18/76

DATE: MAY 4 1976

FROM: Toxicology Branch

TO: Henry Jacoby
Product Manager (24)

PP No. 5F1606 (amendment)
Related Petitions: 5G1553

Chemical Name: 2-chloro-N-(2-ethyl-6-methyl phenyl)-N(2-methoxy-1-methylethyl) acetamide

Proposed Tolerances:

- 0.75 ppm corn fodder and forage
- 0.1 ppm fresh corn, including sweet corn (kernels plus cob with husks removed) and corn grain
- 0.04 ppm eggs, milk, and meat, fat and meat byproducts of cattle, goats, hogs, horses, poultry, and sheep

This amendment only contained the published paper, Toxicologic Studies on 3',4'-Dichloropropionanilide (Stam), (Toxicology and Applied Pharmacology 23,650-659(1972)). The petitioner requested review of this data and that it be used to satisfy long term data requirements for finite residue tolerances.

TOX requested Chemistry Branch to comment on the structure of Stam as compared to CGA-24705. In response, the memo of R. J. Hummel (CB) concluded that the structures are "markedly different" and they are similar only in that they both belong to a broad general class of anilide herbicides. Furthermore, it was pointed out that "the two compounds have different substitutes on both the phenyl ring and the anilide nitrogen, and we would expect their plant and animal metabolites to be equally dissimilar." (emphasis added).

On the basis of these determinations, TOX finds the use of this "cross-over data" totally unacceptable and inappropriate for satisfying TOX data requirements for CGA-24705 (Dual TM).

Laurence D. Chitlik

Laurence D. Chitlik, Toxicologist
Toxicology Branch
Registration Division (WH-567)

E for OEP. 4/29/76

Quick
Hummel
~~*PP 5G1553*~~
PP# 5F1606