PMSD/ISB

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

DEC 19 1988

DEC 19 [redacted]

MEMORANDUM

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

SUBJECT: PP#7F3516. Thiodicarb in or on Leafy Vegetables. Amendment of September 9, 1988.
DEB#: 4438 HED#: 8-1276 MRID#: 408241-00, -01

FROM: Maxie Jo Nelson, Ph.D., Chemist
Tolerance Petition Section I
Dietary Exposure Branch
Health Effects Division (TS-769C)

mjn
RLQ for RSQ

THRU: Robert S. Quick, Section Head
Tolerance Petition Section I
Dietary Exposure Branch
Health Effects Division (TS-769C)

TO: Dennis Edwards, P. M. 12
Insecticide-Rodenticide Branch
Registration Division (TS-767C)

and

Toxicology Branch - IR Support
Health Effects Division (TS-769C)

SUMMARY OF DEFICIENCIES REMAINING TO BE RESOLVED FOR DEB

Revised Section F.

CONCLUSIONS

1. Frozen storage stability data have been submitted (MRID# 408241-01). This deficiency is resolved.

2. Representative chromatograms have been submitted (MRID# 408241-01). This deficiency is resolved.

3. A revised Section F is needed which proposes the tolerance in/on leafy vegetables at 35 ppm.

4. A revised TAS run will be requested of SAOS/SACB/HED upon receipt of the Section F proposing the 35 ppm tolerance.

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RECOMMENDATION

Negative, pending receipt and review of a revised Section F which proposes the tolerance in/on leafy vegetables at 35 ppm.

DETAILED CONSIDERATIONS

INTRODUCTION

In our (M. Nelson) previous review (5/28/87) of this petition, we recommended against the establishment of the proposed tolerance of 30 ppm for combined residues of thiodicarb and its metabolite, methomyl, in or on the leafy vegetables crop group due to lack of frozen storage stability validation data and representative chromatograms.

By transmittal letter (MRID# 408241-00) dated 9/9/88, the petitioner (Rhone-Poulenc Ag Company) has submitted a volume of data (MRID# 408241-01) to address those deficiencies.

DISCUSSION

The petitioner has now provided frozen storage stability data for celery, head lettuce, leaf lettuce, and spinach stored for up to 499 days at -30°C. This deficiency is now resolved.

The average loss of residues per 100 days of frozen storage ranged between 2.1% for celery to 11.4% for spinach.

Correction factors have been applied to the residue values reported for celery, head lettuce, leaf lettuce, and spinach to compensate for the decline in residues during frozen storage.

The appropriate tolerance level, based on application of these correction factors, is now shown to be 35 ppm. This agrees with the petitioner's statements that a proposed tolerance of 35 ppm is intended (see pp. 5, 6, 7, and 8 of MRID# 408241-01).

A revised Section F which proposes the tolerance at 35 ppm in or on leafy vegetables needs to be submitted by the petitioner.

The requested representative chromatograms have been submitted. This deficiency is now resolved.

A revised TAS run will be requested of SAOS/SACB/HED upon receipt of the Section F proposing the higher (35 ppm) tolerance.

cc: Reviewer (M. Nelson), Reading File, PP# 7F3516, Circulation (7), ISB/PMSD (E. Eldredge).
TS-769C:RCB:Reviewer(MJN):CM#2:Rm804:557-7423:typist(mjn):12/19/88.
RDI:SectionHead:RSQuick(byRWCook):12/19/88:DeputyChief:RDSchmitt (byRALoranger):12/19/88.