CAS well # 900AA

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

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OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

Subject: PP#0F2413/FAP#0H5275: Thiodicarb in Soybeans and Cottonseed. Report of method trial.

From: Alfred Smith, Chemist
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Thru: Charles L. Trichilo, Chief
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To: Jay S. Ellenberger (PM #12) I/RB
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and

Toxicology Branch
Hazard Evaluation Division (TS-769)

A successful method trial has been performed with Thiodicarb, dimethyl N,N'-[thiobis[(methylimino)carbonyloxy]]bis[ethanimidothioate], and its metabolite methomyl, N-[(methylcarbamoyl)oxy]thioacetimidate, and soybeans at levels of 0.1 ppm and 0.2 ppm. Recoveries were 62-91% (average: 74-91%) and are acceptable.

We conclude that an adequate method is available for enforcement of the proposed tolerances for combined residues of Thiodicarb and its metabolite methomyl as follows:

Cottonseed	0.4 ppm
Soybeans	0.1 ppm
Soybean straw	0.2 ppm
Cottonseed hulls (FAT)	0.8 ppm
Soybean hulls (FAT)	0.4 ppm

In our memo of 5/25/82, we recommended for the proposed tolerances contingent upon the results of the method trial. The success of the method has resolved this question.

Recommendation

TOX and EFB considerations permitting, we reiterate our favorable recommendation for the proposed tolerances.

When the proposed tolerances are established, Thiodicarb should be added to the list of cholinesterase inhibitors in 40 CFR 180.3(e)(5).

The metabolite methomyl is also a pesticide chemical with established tolerances. Therefore, a subsection should be added to 40 CFR 180.3 (d), i.e., "Tolerances for related pesticide chemicals". [cf. §180.3 (d)(8)].

TS-769:RCB:ASmith:vg:CM#2:RM810:X77377:11/3/82
cc: RF, Circ., Smith, Thompson, FDA, TOX, EEB, EFB, PP#0F2413/FAP#OH5275
RDI: Quick, 11/2/82; Schmitt, 10/2/82

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