



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

FEB 8 1985

2-8-85

MEMORANDUM OF CONFERENCE

OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

SUBJECT: January 6, 1985 Conference with Union Carbide re: RCB's  
1/29/85 Review of PP# 0F2413/FAP# 0H5275/PP# 3F2793/  
FAP# 3H5378 Thiodicarb on Cotton and Soybeans.

FROM: Michael P. Firestone, Ph.D., Chemist  
Tolerance Petition Section II  
Residue Chemistry Branch/HED (TS-769)

*Michael P. Firestone*

THRU: John H. Onley, Ph.D., Section Head  
Tolerance Petition Section II  
Residue Chemistry Branch/HED (TS-769)

*John H. Onley*

TO: RCB Files

Attendees: Union Carbide

EPA

J. Steven Lovell  
Timothy Hunt

Michael P. Firestone, RCB  
V. Frank Boyd, RCB  
Dennis Edwards, RD

Representatives of Union Carbide came to discuss questions arising from RCB's review of an amendment dated 1/22/85 (see M. Firestone memo of 2/4/85).

RCB's concerns included apparent discrepancies between the data submitted in a 11/19/84 amendment and the raw data (requested by RCB in a 12/6/84 review - M. Firestone) submitted in the 1/22/85 amendment. Although methods suitable for enforcement purposes should not require the use of a sample of the untreated commodity as a blank (see Pesticide Assessment Guidelines - Residue Chemistry - Subdivision O), this case is unusual in that the petitioner is attempting to prove that untreated (i.e., control) milk and egg samples actually contain acetamide residues. The petitioner explained that the difference between values for controls and fortified samples was used to calculate recoveries. In some cases, linear regression of values for several fortifications was used. The petitioner was again advised to submit all calculations used to generate the residue data submitted in the 11/19/84 amendment purporting to substantiate the claim that acetamide is endogenous in milk and eggs.

The second major topic concerned EPA's method trial of the procedure used to analyze for acetamide in liver. The results (see M. Firestone memo of 1/29/85) reflected low (46%, 62%) recoveries at a 1.0 ppm fortification, and two reagent blank values of 0.07 ppm. The petitioner indicated that problems were encountered with the samples EPA chemists sent to Union Carbide for analysis. (For example, the tops of sample vials kept popping off upon warming).

RCB suggested that the petitioner formally submit this information to the Agency for review. Also, the petitioner was asked to provide additional information which show that acetamide is not contained in reagent blanks.

Finally, the petitioner asked about the status of PP#4F3013/FAP#4H5421 (Thiodicarb on Tomatoes). RCB responded that the protocols for a tomato metabolism study investigating the occurrence of acetamide was under review at the present time together with review of U.C.'s mathematical postulation of maximum acetamide residues. Also, RCB will request C-<sup>14</sup> acetonitrile data, according to the petitioner's protocols.

TS-769:RCB:M.Firestone:vq:CM#2:Rm810:X77484:2/6/84  
cc: Circu., Firestone, Reading File, Reviewer  
RDI: J. Onley, 2/6/85