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

APR 6 1987

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: PP#6E3411/1FAP#7H5528: Sethoxydim in or on Flax. An Amendment (12/10/87) with Revised Sections B and F. (Accession No. 265700 and RCB Nos. 1820 and 1821)

FROM: V. F. Boyd, Ph.D., Chemist
Residue Chemistry Branch
Hazard Evaluation Division (TS-769C)

THRU: John H. Onley, Ph.D., Section Head
Tolerance Petition Section 2
Residue Chemistry Branch
Hazard Evaluation Division (TS-769C)

TO: Hoyt Jamerson, PM-43
Emergency Response and Minor Use Section
Registration Division (TS-767C)

and

Toxicology Branch
Hazard Evaluation Division (TS-769C)

In response to the RCB memo of 9/10/86, PP#6E3411, V. F. Boyd, Interregional Research Project No. 4 (IR-4) submitted Revised Sections B and F (Food Additive) and the requested field application data under a letter dated December 12, 1986.

The deficiencies enumerated in the RCB evaluation of (9/10/86), the petitioner's response of 12/12/86 and RCB's conclusions, based on the response, are presented below:

Deficiencies:

1a. The petitioner will need to specify the method of application used in his field trials. If the residue data do not reflect the proposed use of application by both air and ground equipment, then the petitioner will have the option of submitting the appropriate data or revising the Section B labeling to comply with that method of application used in his field trials.

1b. A label statement concerning the maximum total herbicide (pt/A) application per season is required (see the "Proposed Use" section of this review for further details).

Petitioner's Response to Deficiencies 1a and 1b:

A Revised Section B is submitted, which reads:

" Flax-Recommendations for Grass Control

For broad spectrum control of grasses, apply a postemergence spray with ground application equipment only at the rate of 2.5 pints/acre. If an additional grass control is needed, apply a postemergence spray at the rate of 1.5 pints/acre 14-21 days after the first application. Always add 2 pints of oil concentrate per acre.

Do not apply POAST® to flax within 75 days of harvest. Do not graze or feed treated flax forage to livestock. Do not spray more than 4 pints of POAST per acre per year."

RCB's Conclusions on Deficiencies 1a and 1b:

The revised labeling for the proposed use includes a limit to ground application, only, and a stated maximum spray application, per year, of 4 pints/Acre/Year.

Deficiencies 1a and 1b are satisfied

Deficiency 4b. The residue data presented are reflective of the proposed use and are considered sufficient for establishing a tolerance residue level of 5.0 ppm for flaxseed and 2.0 ppm for flax straw.

However, the proposed use is expressed in lb ai/A and the established labeling for Poast® is in pt/A. The field trial data do not include information on rate of application correlating pints and lb ai/A. It will be necessary to supply a proposed use in a revised Section B expressed as pt/A. Accordingly, application rates used for each residue field trial must be submitted.

Petitioner's Response to Deficiency 4b:

The above Revised Section B expresses the application rates in terms of pt/A.

Field trial forms recording the actual rates of application used in the field tests wherein flax samples were harvested for residue analyses, are submitted under the letter of amendment, 12/12/86.

RCB's Conclusions on Deficiency 4b:

The Revised Section B properly expresses the application rates in terms of pints/acre. The Field Trial Raw Data confirm that the residue data presented in PP#6E3411, for sethoxydim in flax, came from analysis of flax samples receiving POAST applications, according to the proposed use.

It is concluded that Deficiency 4b is satisfied.

Deficiency 4c. Processed flaxseed resulted in 23 percent increase in residue level in the extracted presscake. A revised Section F including a higher tolerance for flaxseed meal as a feed additive (probably at 7.0 ppm) will be necessary.

Petitioner's Response to Deficiency 4c:

A Section F is submitted proposing to amend 21CFR 561.430 and requesting a feed additive tolerance of 7.00 ppm for residues of sethoxydim and its metabolites (calculated as the herbicide) in or flax seed meal.

RCB's Conclusions on Deficiency 4c:

Deficiency 4c is considered to be satisfied by the Section F submission.

Other Considerations:

An International Residue Limit Status sheet is attached. No international tolerances for flax are established. Therefore, there is no compatibility problem.

Recommendations and Conclusions:

All deficiencies enumerated in our evaluation memo of 9/10/86 (1a, 1b, 4b and 4c) have been resolved by this Petition Amendment of 12/12/86.

RCB recommends for establishment of the following sethoxydim tolerances, providing Toxicology and EAB concur:

Flaxseed	5.0 ppm (40 CFR 180.412)
Flax straw	2.0 ppm (40 CFR 180.412)
Flax seed meal	7.0 ppm (21 CFR 561.430)

RCB:TS-769:F.Boyd:vg:CM#2:Rm804:X77484:3/31/87
cc: Circu., RF., EAB, PP#6E3411, EEB, TOX, PMSD/ISB, F. Boyd
RDI: J.H.Onley, 3/27/87; R.D.Schmitt, 3/30/87

ATTACHMENT

INTERNATIONAL RESIDUE LIMIT STATUS

CHEMICAL Sethoxydim

CCPR NO. _____

PETITION NO. 6E2411

J. Boyd 4/3/87 Boyd 4/3/87

Codex Status

[✓] No Codex Proposal Step 6 or above

Residue (if Step 9): _____

Crop(s)	Limit (mg/kg)

Proposed U.S. Tolerances

Residue: Sethoxydim and 2-Cyclohexen-1-one containing metabolites

Crop(s)	Tol. (ppm)
Flaxseed	5.0
Flax straw	2.0
Flaxseed meal	8.0 (FAP)

CANADIAN LIMIT

Residue: _____

Crop	Limit (ppm)
Flax	0.1 1/

MEXICAN TOLERANCIA

Residue: _____

Crop	Tolerancia (ppm
None	

NOTES:

1/ negligible residue type limit