



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

PM 52/ISR

AUG 7 1989

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: PP# 8F3640/8H5557, Amendment 1 (7/5/89)
Poast^R (Sethoxydim) In/On Dry and Succulent
Beans/Peas, and Bean/Pea Hay and Forage. Revised Label
and Section F.

DEB No(s): 5585, 5586

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Health Effects Division (H7509C)

THRU: Debra F. Edwards, Ph.D., Section Head *Debra Edwards*
Tolerance Petition Section II
Dietary Exposure Branch
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TO: Robert Taylor, PM 25
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and

Fungicide/Herbicide/Antimicrobial Support
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The petitioner, BASF Wyandotte Corporation, previously requested establishment of tolerances for the combined residues of 2-[1-(ethoxyimino)butyl]-5-[2-(ethylthio)propyl]-3-hydroxy-2-cyclohexen-1-one (sethoxydim) and its metabolites containing the 2-cyclohexen-1-one moiety, calculated as the herbicide, in or on dry and succulent beans, dry and succulent peas, bean forage and hay, and pea forage and hay.

Currently, permanent tolerances have been established for soybeans (10.0 ppm), cotton seeds (5.0 ppm), peanuts (25.0 ppm), sunflower seeds (7.0 ppm), beet sugar roots (0.1 ppm), meat and fat (0.2 ppm, each), milk (0.05 ppm), and eggs (0.5 ppm). Established tolerances in or on animal feeds include alfalfa forage and hay (40.0 ppm, each), soybean hay (10.0 ppm), and peanut hull (5.0 ppm).

CONCLUSIONS

The deficiencies raised in the previous DEB memorandum (11/4/88) have been satisfactorily addressed.

RECOMMENDATIONS

Toxicological considerations permitting, DEB recommends that 40 CFR 180.412 be amended by establishing tolerances for the combined residues of 2-[1-(ethoxyimino)butyl]-5-[2-(ethylthio)propyl]-3-hydroxy-2-cyclohexen-1-one (sethoxydim) and its metabolites containing the 2-cyclohexen-1-one moiety, calculated as the herbicide, in or on the following agricultural commodities (tolerances in ppm are given in parenthesis):

Dry Beans	(20.0)
Succulent Beans	(5.0)
Bean Forage	(10.0)
Bean Hay	(50.0)
Dry Peas	(40.0)
Succulent Peas	(10.0)
Pea Forage	(20.0)
Pea Hay	(40.0)
Eggs	(2.0)
Poultry Meat-By-Products	(2.0)

NOTE TO PM:

Although tolerances for the animal feed items, bean hay/forage and pea hay/forage, have been proposed under 40 CFR 180.2800, they should, like those for the subject food commodities, be established under 40 CFR 180.412.

DETAILED CONSIDERATIONS

A summary of pertinent deficiencies (conclusions) raised in DEB memorandum of 11/4/88 is followed by the petitioner's current response and DEB comments. The numbers used correspond to those in the previous memorandum.

Deficiency #2

The label provided for succulent beans/peas is not consistent with the proposed preharvest intervals and agricultural practices. The petitioner should provide an appropriately revised label.

(3)

BASF Response:

A revised label has been submitted in which the labeling inconsistency has been resolved; a preharvest interval of 15 days is proposed for succulent beans and peas.

DEB Comment(s):

This deficiency has been satisfactorily addressed.

Deficiency #6a

The proposed tolerances for dry peas and pea hay adequately cover the expected residues for the subject food and feed commodities. However, based on the maximum residues of sethoxydim/metabolites found in the other commodities, submission of a revised Section F is recommended in which tolerances of 20.0, 5.0, 10.0, 50.0, 10.0, and 20.0 ppm are proposed for dry bean, succulent bean, succulent pea, bean hay, bean forage, and pea forage, respectively.

BASF Response:

A revised section F has been provided in which the requested tolerances have been proposed for the subject commodities. It should be noted that, tolerances for the animal feed items, pea hay/forage and bean hay/forage, have been proposed under 40 CFR 180.2800.

DEB Response:

This deficiency has been addressed. However, tolerances should be established for the subject food as well as feed items under 40 CFR 180.412.

Deficiency #6b

The established tolerances on meat, fat, and milk adequately cover the secondary residues expected from the proposed applications. However, based on the previously submitted residue data on poultry commodities, submission of a revised Section F is recommended in which tolerances for animal commodities, eggs and poultry meat-by-products, are raised to 2.0 ppm.

BASF Response:

A revised section F has been provided in which the requested tolerances are proposed for the subject commodities.

DEB Comment(s):

The subject deficiency has been satisfactorily addressed.

(4)

cc: Reading File, Circulation, Reviewer (H. Fonouni), pp#
8F3640/8H5557, TAS, ISB/PMSD (E. Eldredge), FDA.

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RDI:Section Head:D. Edwards:8/7/1989.