JOHNNIE MILLER — PM23 (RD-7505C)

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

APR 16 1997

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: PP#5G4484. Isoxaflutole on field corn. Minutes for 11/1/95 conference. DP Barcode D221711. CBTS No. 16711. Chemical No. 123000. No MRID # Case No. 286343.

FROM: Richard Loranger, Ph.D., Chemist
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R. Loranger

THRU: Elizabeth Haeberer, Acting Chief
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Elizabeth T. Haeberer

TO: Barbara Madden, Registration Section
Risk Characterization and Analysis Branch
Health Effects Division (7509C)

Rhone-Poulenc Ag Company has submitted minutes for a meeting held on 11/1/95 to discuss issues concerning animal metabolites for the herbicide isoxaflutole. We have been requested to comment/concur on the minutes provided by Karen Shearer (letter of 11/27/95). Temporary and permanent tolerances have been proposed for residues of isoxaflutole (5-cyclopropyl-4-isoxazolyl [2-(methylsulfonyl)-4-trifluoromethylphenyl] methanone) and its metabolites to cover use in field corn in PP#'s 5G4484 and 6F4664. Since the meeting we have reviewed both of these petitions (see memos by P. Errico, 12/7/95 and G. Kramer, 8/14/96, respectively).

The minutes provide an accurate record of the discussion at the aforementioned meeting. However, we do have the following comments to forward to the petitioner.

With respect to the need for livestock commodity tolerances (point 1c in letter), we note that a key factor is whether or not quantifiable residues are found in the 10x dosing level of the feeding study. If quantifiable residues are <u>not</u> found at the 10x level, tolerances for residues in animal commodities are normally not required.

The poultry and cattle feeding studies (points 2 and 3) have been reviewed. The petitioner should refer to conclusions 12 and 13 of the 8/14/96 G. Kramer review for more details. As stated there, additional data may be required depending upon input by the HED Metabolism Committee.

With regard to metabolites in the tolerance expression versus those in just the risk assessment (point 4), the final decision is again to be made by the HED Metabolism Committee.

Finally, an exotic analytical method is acceptable for a metabolite that will be included in only the risk assessment (point 5). We concur that a conventional method for enforcement purposes would be needed for only those moieties in the tolerance expression, which as noted above will be determined by the Metabolism Committee.

cc: RF, PP#5G4484, PP#6F4664, Joanne Miller-PM 23 (RD-7505C), Loranger