PP# 4407 7-26-95

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

JUL 26 1995

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: PP# 4F04407. Sulfentrazone (Authority 4F and 75DF Herbicide) for Use on Soybeans. **Data Waiver Request.** MRID# none. Barcode D215737. Case 285935. CBTS# 15655.

FROM: G.F. Kramer, Ph.D., Chemist
Tolerance Petition Section III
Chemistry Branch I, Tolerance Support
Health Effects Division (7509C)

THRU: M.S. Metzger, Branch Chief
Chemistry Branch I, Tolerance Support
Health Effects Division (7509C)

TO: JoAnne Miller, Product Manager
FHB
Registration Division (7505C)

FMC has submitted an application for the following permanent tolerances for the combined residues of the herbicide sulfentrazone and its major metabolite 3-hydroxymethyl sulfentrazone:

Soybean Seed	--	0.05 ppm
Aspirated Grain Fractions	--	0.05 ppm

To cover residues in rotational crops, the petitioner has proposed the following tolerances (expressed as parent plus the metabolites 3-hydroxymethyl sulfentrazone and 3-desmethyl sulfentrazone:

Wheat Forage	--	0.10 ppm
Wheat Straw	--	0.10 ppm
Wheat Grain	--	0.10 ppm
Corn Fodder	--	0.10 ppm
Corn Silage	--	0.10 ppm
Corn Grain	--	0.10 ppm

The registrant is requesting a data waiver for the magnitude of the residue in wheat processed fractions study.

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CONCLUSIONS/RECOMMENDATIONS

Provided that the deficiencies in the rotational crop studies are fulfilled (see conclusions 3c and 12c of Memo, of G. Kramer 4/3/95), CBTS recommends in favor of the requested data waiver. A processing study for rotational wheat will not be required for this study.

DETAILED CONSIDERATIONS

The minimum rotational interval for wheat, as specified on the sulfentrazone label, is 120 days. Both confined and field rotational crop studies for sulfentrazone have been performed (for review, see Memo of G. Kramer 4/3/95). In the confined study (treatment rate of 0.5 lbs. ai/A - 1.3X), the maximum level of any sulfentrazone metabolite in 122 DAT barley grain was 0.006 ppm. In five limited field trials (also performed at 1.3X), residues of sulfentrazone and all metabolites were <0.005 ppm in the grain of wheat planted 127-181 DAT. The maximum theoretical concentration factor for wheat is 8.3X in shorts. As 8.3 multiplied by the maximum resisidue observed in the field rotational crop studies (8.3 x <0.005 ppm = <0.042) is below the LOQ of the enforcement method (0.05 ppm), CBTS has no expectation of finite residues in wheat processed commodities. However, deficiencies in both of these studies were identified. Further characterization of bound residues was required for the confined study (conclusion 3c of Memo, of G. Kramer 4/3/95) and storage stability data were required for the field studies (conclusion 12c of Memo, of G. Kramer 4/3/95). Provided that these deficiencies are fulfilled, CBTS recommends in favor of the requested data waiver.

cc: PP# 4F4407, S.F., Kramer, circ., R.F.
RDI: F.D. Griffith (7/24/95), M.J. Nelson for R.A. Loranger (7/25/95), M.S Metzger (7/25/95)
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