



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

OCT 31 1994

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: PP# 3G04272. New Chemical- Sulfentrazone in or on soybeans. Amendments of 9/26/94. MRID# none. Barcode D207901. CBTS# 14465.

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

THRU: P.V. Errico, Section Head  
Chemistry Branch I, Tolerance Support  
Health Effects Division (7509C)

TO: JoAnne Miller, Product Manager  
Jesse Mayes, Team 23 Reviewer  
Registration Division (7505C)

And

Albin Kocialski, Head  
Registration Section, CCB  
Health Effects Division (7509C)

FMC is proposing temporary tolerances for 3-hydroxymethyl sulfentrazone (N-[2,4-dichloro-5-[4-(difluoromethyl)-4,5-dihydro-3-hydroxymethyl-5-oxo-1H-1,2,4-triazol-1-yl]phenyl]methanesulfonamide), the major metabolite of sulfentrazone (N-[2,4-dichloro-5-[4-(difluoromethyl)-4,5-dihydro-3-methyl-5-oxo-1H-1,2,4-triazol-1-yl]phenyl]methanesulfonamide). The registrant has proposed the following tolerance for 3-hydroxymethyl sulfentrazone:

Soybeans -- 0.025 ppm

The current amendment addresses the remaining deficiencies identified in CBTS' previous review (Memo, G. Kramer 4/25/94) and not resolved in the previous amendment (Memo, G. Kramer 9/1/94).



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In the Detailed Considerations section of this Memo, the outstanding deficiencies, listed as presented in the Memo of G. Kramer 4/25/94, are followed by the petitioner's response and our conclusions.

#### CONCLUSIONS/RECOMMENDATIONS

Sections B and F have been revised as requested. CBTS recommends in favor of the proposed temporary tolerances of 0.050 ppm for the combined residues of sulfentrazone and the major metabolite hydroxymethyl sulfentrazone on soybeans.

#### DETAILED CONSIDERATIONS

##### Deficiency - Conclusion 2b (from Memo, G. Kramer 4/25/94)

2b. The directions for use are adequate with the following exceptions: 1) the crop rotation restriction should be changed to "Do not rotate to any crop except soybeans." 2) the ANSI systemic name for the sulfentrazone should be included on the label. A revised Section B is required.

**Petitioner's Response:** Submission of a revised section B.

**CBTS' Conclusion:** Section B has been revised as requested. This deficiency is now resolved.

##### Deficiency - Conclusion 8c (from Memo, G. Kramer 4/25/94)

8c. The Section F submitted by the registrant is not adequate for this EUP. As written, the parent compound is not included. The tolerance expression must be revised to include both sulfentrazone and hydroxymethyl-sulfentrazone. The common name of the parent compound and the preferred systemic names of sulfentrazone and hydroxymethyl-sulfentrazone should be included. Also, the level of the tolerance should be at least the sum of the LOQ of all compounds included. In this case, the LOQ for sulfentrazone and hydroxymethyl-sulfentrazone is 0.025 ppm each, for a total of 0.050 ppm. A revised Section F is required.

**Petitioner's Response:** Submission of a revised which proposes a tolerance of 0.050 ppm for the combined residues of sulfentrazone (N-[2,4-dichloro-5-[4-(difluoromethyl)-4,5-dihydro-3-methyl-5-oxo-1H-1,2,4-triazol-1-yl]phenyl]methanesulfonamide) and the major metabolite hydroxymethyl sulfentrazone (N-[2,4-dichloro-5-[4-(difluoromethyl)-4,5-dihydro-3-hydroxymethyl-5-oxo-1H-1,2,4-triazol-1-yl]phenyl] methanesulfonamide).

**CBTS' Conclusion:** Section F has been revised as requested. This deficiency is now resolved.

cc: PP#3G04272, Kramer, circ., R.F.  
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(10/26/94)  
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