

10/6/94

MEMORANDUM:

SUBJECT: PP#3F4187. Thiazopyr (MON-13200) in/on Citrus and Cotton. Rotational Crop Study. Storage Stability Data. MRID#'s 430963-00 and 430963-01. CBTS #13158. DP Barcode #D198931.

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THRU: Richard A. Loranger, Ph.D., Acting Chief  
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TO: Joanne Miller/Eugene Wilson, PM 23  
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and

Albin Kocialski  
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Monsanto Company has submitted a cover letter dated January 20, 1994 and additional residue data consisting of a field rotational crop study, storage stability data in cotton RAC's and in processed cottonseed commodities to support PP#3F4187 and their request for the establishment of permanent tolerances for residues of the selective herbicide thiazopyr (ISO common name) [3-pyridine carboxylic acid, 2-(difluoromethyl)-5-(4,5-dihydro-2-

thiazolyl)-4-(2-methylpropyl)-6-(trifluoromethyl)-, methyl ester] and its metabolites determined as 3-pyridine carboxylic acid, 5-(aminocarbonyl)-2-(difluoromethyl)-4-(2-methylpropyl)-6-trifluoromethyl-, methyl ester and 3-pyridine carboxylic acid, 2-(difluoromethyl)-4-(2-methylpropyl)-5-(((2-sulfoethyl)amino)carbonyl)-6-trifluoromethyl and expressed as parent equivalents in/on citrus and cotton commodities.

TOX has recently classified thiazopyr as a Group C carcinogen (See memo of 05/25/94, P. Hurley, TOX). In addition, based on a citrus processing study, it appears that a 409 tolerance should be established on citrus oil (See memo of 10/06/94, J. Stokes). **Therefore, CBTS, according to Agency policy issued in the Federal Register, Vol 59, No. 66, entitled "Pesticides; Prioritization of Actions Subject to the Delaney Clause; Policy Notice", must return the submitted data without review.**

cc: J. Stokes (CBTS); Chris Gillis (PSPS, 7501C); PP#3F4147;  
R.F.; Circu  
RDI:Perrico:09/29/94:RLoranger:10/05/94  
7509C:CBTS:CM#2:Rm803:JStokes:js:305-7561:10/06/94