

2/11/97

MEMORANDUM

SUBJECT: PP#3F4187. Thiazopyr in/on Orange and Grapefruit.
Revised Enforcement Analytical Methodology. No MRID#.
CBTS #17743. DP Barcode #D232653. Chemical No. 129100.
Case No. 284389.

FROM: Jerry B. Stokes, Chemist
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Health Effects Division (7509C)

THRU: Elizabeth Haeberer, Acting Chief
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Health Effects Division (7509C)

TO: Steve Robbins
Risk Characterization Analysis Branch
Health Effects Division (7509C)

Rohm and Haas Company, the petitioner, has submitted a cover letter dated 01/15/97 and a revised enforcement method (per request of CBTS, See memo of 01/07/97, J. Stokes) to support the establishment of permanent tolerances for residues of the selective herbicide thiazopyr [3-pyridine carboxylic acid, 2-(difluoromethyl)-5-(4,5-dihydro-2-thiazolyl)-4-(2-methylpropyl)-6-(trifluoromethyl)-, methyl ester] and its metabolites determined as 2-(difluoromethyl)-6-(trifluoromethyl)-3,4,5-pyridinetricarboxylic acid, all expressed as parent equivalents in/on the RACs orange and grapefruit at 0.05 ppm.

CONCLUSIONS/RECOMMENDATION:

CBTS accepts the revised enforcement method dated 01/15/97 with the suggested rewrites. Deficiency 6a (See memo of 09/12/94, J. Stokes) is now resolved. There are no outstanding deficiencies remaining in PP3F4187.

Toxicological considerations permitting, CBTS recommends for the establishment of the following tolerances for thiazopyr and its metabolites determined as 2-(difluoromethyl)-6-(trifluoromethyl)-3,4,5-pyridinetricarboxylic acid:

Orange, 0.05 ppm and grapefruit, 0.05 ppm

However, HED notes that the Food Quality Protection Act of 1996 has amended and strengthened the standard for establishing tolerances under the FFDCA. OPP is still assessing the full impact of this change in the law on the tolerance-setting process and plans to issue guidelines concerning the establishment of tolerances under the amended statute. All tolerance petitions have to meet the requirements of the FFDCA as amended by the FQPA and OPP may require additional data to determine if the terms of the amended statute are met. Although CBTS is recommending in favor of establishment of these tolerances at this time, that recommendation will be subject to review as OPP develops guidelines under the amended statute.

cc: J. Stokes (CBTS); PP#3F4187; J. Miller/E. Wilson (PM 23);
Circ; RF

RDI:02/07/97:RLoranger:02/11/97:EHaerberer
7509C:CBTS:CM#2:Rm803:JStokes:js:305-7561:02/11/97