2/13/97

MEMORANDUM

SUBJECT: PP#3F4187. Thiazopyr in/on Orange and Grapefruit. Revised Sections B and F. No MRID#. CBTS #17764. DP Barcode #D233160. Chemical No. 129100. Case No. 284389.

FROM: Jerry B. Stokes, Chemist
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THRU: Elizabeth Haeberer, Acting Chief
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TO: Steve Robbins
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Health Effects Division (7509C)

Rohm and Haas Company, the petitioner, has submitted a cover letter dated 02/03/97 and revised Sections B and F (Section F 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.

CBTS CONCLUSIONS:

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The revised Section F is adequate to support use on orange and grapefruit. However a revised label (Section B) lists other citrus, which according to 40 CFR 180.41 cannot be included unless a crop group tolerance is established. The petitioner previously decided to request tolerances only on the RACs orange and grapefruit (See memo of 07/09/96, J. Stokes). The label must adequately reflect use on the RACs orange and grapefruit only.

Note to PM: CBTS has reviewed the field trial and processing data submitted in this petition (PP#3F4187) and has the following comments:

1) Adequate field trial data has been submitted for the representative crops (orange, grapefruit, and lemon) to support a 0.05 ppm thiazopyr crop group tolerance in/on citrus fruits.

2) The petitioner's processing studies for orange and grapefruit show a slight concentration (ca. 10X) in citrus oil at a 5X application rate. The petitioner's processing study for lemon shows a much larger concentration (ca. 100X) in lemon oil at a 5X application rate. Considering all the processing studies, CBTS could recommend that a 408 tolerance be established at 0.1 ppm for residues of thiazopyr and its metabolites in citrus oil if a citrus crop group tolerance were to be requested.

RECOMMENDATIONS:

CBTS continues to recommend for the establishment of 0.05 ppm tolerances for thiazopyr and its metabolites determined as 2-(difluoromethyl)-6-(trifluoromethyl)-3,4,5-pyridinetricarboxylic acid in/on orange and grapefruit. However a revised Section B should be submitted to reflect use on only the RACs orange and grapefruit.

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

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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:02/11/97:RLoranger:02/13/97:EHaeberer
7509C:CBTS:CM#2:Rm803:JStokes:js:305-7561:02/13/97