

1/17/97

MEMORANDUM:

SUBJECT: PP#3F4187. Thiazopyr (MON13200) in/on RAC's Orange and Grapefruit. Amendment Dated November 25, 1996. No MRID #. CBTS #17706. DP Barcode D231848. 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 and Analysis Branch
Health Effects Division (7509C)

Rohm and Haas Company has submitted a cover letter dated November 25, 1996 to address deficiency 3b cited in PP#3F4187 (See memo of 09/12/94, J. Stokes). The petitioner has requested the establishment of a 0.05 ppm permanent tolerance 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 expressed as parent equivalents in the RACs orange and grapefruit as defined in 40 CFR 180.1 (h).

Conclusions and Recommendation:

All deficiencies in this PP#3F4187 (See memo of 09/12/94, J. Stokes) have been completely satisfied except 6a (proposed enforcement methodology) (See memo of 01/07/97, J. Stokes). We recommend **against** the proposed tolerances until the method is rewritten to address ACL's comments.

Detailed Considerations:

Deficiency 3b, Memo of 09/12/94, J. Stokes

The submitted data are not adequate for Guideline 62-2. The nominal concentration listed for the active ingredient in MRID# 246197-02 does not agree with the nominal concentration on the CSF dated 12/11/92. Please submit the correct value.

Petitioner's Response dated 11/25/96

A revised Confidential Statement of Formula (CSF) has been submitted dated 11/25/96.

CBTS Comment

Deficiency 3b has now been resolved. See attached Confidential Appendix.

Attachment: Confidential Appendix (2 pages)

cc with Attachment: PP#3F4187, J. Stokes, J. Miller/E. Wilson (PM 23), E. Haeberer, R.F.

cc without Attachment: Circu.

RDI: RLoranger:01/16/97:EHaeberer:01/16/97
7509C:CBTS:JStokes/js:CM#2:Rm803:305-7561:01/17/97