

MEMORANDUM

12/24/96

SUBJECT: PP#3F4187. Thiazopyr in/on Orange and Grapefruit.
Petition Method Validation Results. MRID#'s 437499-01,
437499-02, 437499-03, and 439226-02. CBTS #17669. DP
Barcode #D231900. Chemical No. 129100. No Case No.
assigned.

FROM: Jerry B. Stokes, Chemist
Chemistry Branch/Tolerance Petition Team 2
Health Effects Division (7509C)

THRU: Elizabeth Haeberer, Acting Chief
Chemistry Branch/Tolerance Support
Health Effects Division (7509C)

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

The Analytical Chemistry Laboratory (ACL, ACB, BEAD, OPP) has completed a method validation of a proposed enforcement method submitted by Rohm and Haas Company to support 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 the RACs orange and grapefruit at 0.05 ppm.

RESULTS:

CBTS requested that a petition method validation be run at fortification levels of 0.025 (limit of quantitation, LOQ) and 0.05 ppm (tolerance level) in orange. The validation results (See Attachment 1) show adequate recoveries at these fortified levels in the RAC orange at 77% and 72% (0.025 ppm level) and 67% and 86% (0.05 ppm). ACL estimated the limit of detection (LOD) at 0.003 ppm and the LOQ at 0.015 ppm using the negative chemical ionization GC/MS.

According to comments from ACL, if the method is modified and rewritten to incorporate the attached comments in the ACL method validation report plus those from the ACL pre-review report, the method will be adequate for an enforcement method. The ACL report is attached (See Attachment 1).

CONCLUSIONS/RECOMMENDATION:

CBTS will not accept the proposed enforcement method without the suggested rewrites. The petitioner should make the suggested changes/corrections to ACL comments 1, 2, 5, 7, 8, 9, and 14 (See Attachment 1), and submit this rewrite to CBTS for review.

Attachment 1: ACL report, Memorandum from C. Stafford (ACL) to E. Zager, dated 10/10/96, (including ACL Attachments: ACL Pre-review Report and Sample Chromatograms).

cc with Attachment 1 (with ACL Attachments): J. Stokes (CBTS); PP#3F4187; J. Miller/E. Wilson (PM 23)

cc with Attachment 1 (memorandum only, ACL Attachments not included): Circ; RF

RDI:RLoranger:12/12/96:EHaerberer:12/19/96
7509C:CBTS:CM#2:Rm803:JStokes:js:305-7561:12/24/96