03/27/95

MEMORANDUM:

SUBJECT: PP#3F4187. Thiazopyr (MON13200) in/on Citrus Processed Commodities. Amendment of March 1, 1995. No MRID#. CBTS #15235. DP Barcode #D212889.

FROM: Jerry B. Stokes, Chemist
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THRU: Ed Zager, Acting Chief
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TO: Joanne Miller/Eugene Wilson, PM 23
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and

Jane Smith, Acting Section Head
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Health Effects Division (7509C)

Rohm & Haas Company, the present registrant for the herbicide thiazopyr (the former registrant was Monsanto Company) has submitted a response dated March 1, 1995, in regards to a CBTS review (See memo of 10/07/94, J. Stokes).

CBTS previously commented:

"CBTS policy (See memo of 11/17/88, C. Trichilo) dictates that if the highest practical exaggerated rate is less than the theoretical concentration (1000X for citrus oil), then samples from the highest practical exaggerated rate studies should be processed. If processed commodities do contain detectable residues, then a food/feed additive tolerance is required. Based on the above concentration factors for orange and grapefruit, it appears that thiazopyr residues concentrate in the citrus oil, slightly more in orange than grapefruit. Although the observed concentration is far less than the theoretical concentration of 1000X, it is observed as evidenced by the residue data in Tables 4, 5, and 6. Since tolerances are established on citrus oil, and not the individual citrus fruit, the concentration used to determine the value of the 409 tolerance for citrus oil would be the average for orange (16X) and grapefruit (4X). This is 10X, and based on the proposed 0.05 ppm tolerance on the RAC, a food additive tolerance of 0.5 ppm should be proposed.

This of course is a problem since thiazopyr has now been classified as a Group C carcinogen (See memo of 05/25/94, P. Hurley, TOX), and this classification causes a discontinuation of data review according to the current Agency policy of prioritization of actions subject to the Delaney Clause."

Conclusions/Recommendations:

In consideration of the registrant's comments submitted as an attachment to the company letter dated March 1, 1995 (Rohm & Haas Company, R.Gaughan) and in reconsideration of our previous comments cited above, CBTS has determined that an FAT is **not** needed for thiazopyr residues in citrus oil. CBTS agrees with the registrant that "real weathered residues" on the RAC will be less than the LOQ when applied according to the proposed label rate. In addition, when the residues found in citrus oil following exaggerated application rates are adjusted to the maximum proposed rate, they would not be expected to exceed the 408 tolerance for citrus fruit. Thus a 409 tolerance will not be needed for citrus oil for the proposed use of thiazopyr on orange, grapefruit, and tangerine. CBTS previously determined that a 409 tolerance was not needed for dried citrus pulp.

Therefore, review of PP#3F4187 for the proposed use of thiazopyr on orange, grapefruit, and tangerine should be reinitiated.

cc: J. Stokes (CBTS); Chris Gillis (PSPS, 7501C); PP#3F4147; R.F.; Circu
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