10/31/95

MEMORANDUM

SUBJECT: FAP#3F4187. Thiazopyr in/on Citrus and Cottonseed. Analytical Methodology. MRID#'s 437499-01, 437499-02, and 437499-03. CBTS#16088. DP Barcode #D218507.

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THRU: Michael Metzger, Chief
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TO: Joanne Miller/Eugene Wilson, PM 23
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Rohm and Haas Company has requested 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 as follows: citrus, whole fruit, 0.05 ppm (orange and grapfruit), and cottonseed, 0.05 ppm.

The petitioner has now submitted an analytical enforcement

methodology for thiazopyr and its metabolites using a common chemophore (MRID#'s 437499-01, 437499-02, and 437499-03). The method has been validated by the petitioner and an independent laboratory in racs of sugarcane and cherries, and in the dairy cow edible tissues and milk.

In a previous request (See memo of 09/12/94, J. Stokes), CBTS asked that bridging data (i.e., 10% of samples) be submitted with this proposed analytical enforcement methodology. The HED Metabolism Committee determined that with respect to enforcement, the appropriate tolerance expression will be based on the methodology available and its ease of use (See memo of 04/25/95, J. Stokes). CBTS can not recommend a tolerance expression without knowing the behavior of the proposed methodology in the petitioned racs of citrus and cottonseed. CBTS can not translate the recovery validation data for sugarcane and cherries to citrus and cottonseed.

Therefore, before CBTS requests a petition method validation from the Agency laboratory in Beltsville, the petitioner must provide recovery validation data for orange and cottonseed to include copies of standard curves, sample calculations, and representative chromatograms for controls and fortified samples, and estimates of the detection and quantitation limits for the method in these racs. An independent laboratory validation of this data will not be needed, **provided** there are no major procedural changes in the proposed methodology required for citrus or cottonseed.

cc: PP#3F4187; J. Stokes (CBTS); Circu.; R.F.
RDI:PErrico:10/20/95:RLoranger:10/26/95:MMetzger:10/30/95
7509C:CBTS:CM#2:Rm803:JStokes:js:305-7561:10/31/95

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