US EPA ARCHIVE DOCUMENT

Branch
Wolff
Jrf

COMMISSIONER OF FOOD AND DRUGS

May 18, 1965

File: PP# 5F042

BRIEFING MEMORANDUM
Dow Chemical Company
Midland, Mich. (AF 15-946)

Drew M. Baker, Jr.
Petitions Control Branch, BSSE

"Trizone"
Pesticide Petition Nos. 5F0426 and 5F0427

"Trizone" is the Dow trade name for a soil fumigant formulation containing methyl bromide, propargyl bromide, and chloropicrin. The attached order is a new pesticide regulation to provide for the safe use of "Trizone" on eggplants, muskmelons, tomatoes, broccoli, cauliflower, peppers, pineapples and strawberries. The order establishes tolerances for the residues of inorganic bromides (calculated as Br) that result from the proposed use of "Trizone." As amended by the petitioner the tolerances requested for inorganic bromides are 60 ppm on eggplants, 40 ppm on muskmelons and tomatoes, 25 ppm on broccoli, cauliflower, peppers, pineapples, and strawberries.

The Pesticides Regulation Division, ARS, USDA, has certified usefulness of "Trizone" for the purposes for which tolerances are sought. They find that the proposed tolerances reasonably reflect the amount of residues likely to result from the proposed usage.

The Division of Food Standards and Additives finds that the analytical method proposed in these petitions is adequate for enforcement of the proposed tolerances. They find that the residues of inorganic bromide from the use of "Trizone" as proposed in the petition will not exceed the proposed individual tolerances. They find that there will not be any residues of methyl bromide, propargyl bromide, or chloropicrin per se from the proposed usage.

Since there is no means of distinguishing the individual sources of the inorganic bromide residues, they recommend that the regulation be based on the combined residues from the proposed use of "Trizone." They find that the feeding of bran from pineapples grown in fumigated soil would not result in residues in meat (the bran is not fed to beef cattle) and would increase the background bromide level in milk by less than 5 ppm. They conclude that inorganic bromide residues that would result from the establishment of the requested tolerances would not exceed previously established tolerances for inorganic bromides except on eggplants, where the increase would be from 50 to 60 ppm.

The Division of Toxicological Evaluation concludes that no hazard would exist by establishment of the requested tolerances since additional inorganic bromide would not be added to the human diet.

The Fish and Wildlife Service, USDI, has no objection to the establishment of the requested tolerances.

We recommend that the attached order be signed and published.

APPROVED:

F. J. McFarland
Assistant to the Director
Bureau of Scientific Standards
and Evaluation

Robert S. Roe, Director
Bureau of Scientific Standards
and Evaluation

cc: PCB FSA TE ACR GC(Hearing Clerk) FRW
FP 5F0426 PP 5F0427 DFO FI EWH(Temp tol bk)
DMBaker:mak 5/18/65 DMB:mcs 5/6/65
R/D Init: GJBeusch 4/21/65
OGFitzhugh 4/23/65

R/D Signed FJMcFarland; RSRoe by LLRamsey