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## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCESMEMORANDUM

Date: October 12, 2004

Subject: PP#1F06312 – Sulfuryl Fluoride. Section 3 Registration for the Post-harvest Fumigation of Stored Cereal Grains, Dried Fruits, and Tree Nuts, and Fumigation of Grain Milling Establishments. Corrected Summary of Analytical Chemistry and Residue Data.

DP Number:	309015	Case No.:	294172
PC Code:	078003	Submission:	S597868
40 CFR 180.	575	MRID Nos.:	45396301, 45510302, 45510302, 45510303, 45510304, 45603901, 45632902

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**NOTE: This Residue Chemistry Summary Document corrects errors in the original summary document addressing petition 1F06312 (D283007, M. Doherty, 1/13/04). The original summary document is based in part on DER 45396301 which incorrectly reported residues of sulfuryl fluoride in corn grits as 14.4 ppm rather than 14.4 ppb. The DER has been corrected. This document reflects the data in the corrected DER.**

**Executive Summary**

Sulfuryl fluoride is being proposed as a methyl bromide replacement to control post-harvest insect and rodent pests in stored grain, dried fruit, and tree nut commodities and in grain milling establishments. Sulfuryl fluoride is a fumigant and, in the form of ProFume™, is formulated as 99+% active ingredient. The fumigation rate for sulfuryl fluoride is the product of the fumigant concentration and exposure time. The maximum target rate is 1500 mg·hr/L for normal atmospheric fumigations and 200 mg·hr/L for vacuum fumigations. Double fumigations are recommended for insect infestations where eggs may be present, with the second fumigation timed to control newly hatched, immature stages. The proposed label specifies that all food

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commodities be aerated for a minimum of 24 hours prior to the foods entering commerce.

Tolerances are currently established under an experimental use permit for residues of sulfuryl fluoride in/on walnuts and raisins (40 CFR 180.575) and for residues of inorganic fluoride resulting from the use of either sulfuryl fluoride or cryolite (40 CFR 180.145). Sulfuryl fluoride is highly reactive and breaks down to form sulfate and fluoride anions. Parent sulfuryl fluoride and the fluoride anion are the residues of concern for both the tolerance expression and risk assessment purposes.

Storage stability data were not submitted for sulfuryl fluoride. Samples were analyzed for sulfuryl fluoride residues as rapidly as possible following the post-fumigation aeration period. Because the storage interval was very short, storage stability data are not needed for sulfuryl fluoride, per se. Storage stability data for fluoride anion indicate that fluoride is stable in wheat grain, corn grain, corn meal, raisins and walnuts for up to 140 days. Fluoride residues decline in wheat flour at a rate of 0.3% per day. It is unclear whether this reflects a true dissipation of fluoride from the samples or an increase in "bound" residues. Background residues of fluoride in the control samples for all commodities in the storage stability study decrease with time and the rate appears to be of the same order of magnitude as that observed for wheat flour. How this decline of fluoride anion in the control samples relates to residues in treated commodities or to the regulation of fluoride anion is unclear at this time.

The petitioner has proposed separate methods for the analysis of sulfuryl fluoride and fluoride anion. Residues of sulfuryl fluoride are extracted with water, allowed to volatilize, and then determined by a GC/ECD method that uses headspace analysis. Based on validation data, the limit of detection (LOD) is 0.001 ppm and the limit of quantitation (LOQ) is 0.008 ppm (0.02 ppm for corn grain and wheat germ). The method for the analysis of fluoride anion uses aqueous buffered extraction and a fluoride-selective electrode with the double-known-addition technique for quantifying residues. The petitioner initially reported that the LOD and LOQ for the fluoride method are 0.2 and 0.5 ppm, respectively. Following the independent laboratory validation, the LOQ for the fluoride method was increased to 2 ppm. The petitioner has not demonstrated that either method is capable of extracting incurred residues from cereal grain commodities. Both methods have been reviewed by the Agency's Analytical Chemistry Branch, which recommended that (1) the petitioner radiovalidate both methods and (2) OPP accept the analytical methods without a laboratory validation based on the submitted data (Method Review Memorandum, D. Wright, D282408, 8/14/03).

The proposed tolerances are based on minimal data. Although the petitioner submitted a large quantity of data from studies investigating the effects of various fumigation parameters on sulfuryl fluoride and/or fluoride anion residue levels, very few studies were conducted according to the proposed label directions. In examining the residue data, HED has pooled data across various fumigation parameters where those parameters appear to have little effect on residue levels.

*Cereal Grains.* Generally, residues of sulfuryl fluoride were below the limit of quantitation in the cereal grain commodities following fumigation at ~1500 mg·hr/L and an

(0.057 ppm), corn grain (0.026 ppm), corn grits (0.0144 ppm). All samples of fumigated corn oil had quantifiable residues of sulfuryl fluoride, with a maximum residue of 7.84 ppm. Apparent residues of sulfuryl fluoride were less than the LOQ in all control samples. For cereal grains, residues of fluoride anion were greater than the LOQ in all commodities except corn oil. Fluoride residues increase with multiple fumigations and appear to be recalcitrant, not declining following longer aeration intervals. Fluoride residues from mill fumigation studies were generally greater than those that resulted from laboratory fumigation studies of cereal grain commodities. Following a single fumigation at ~1500 mg·hr/L, maximum residues ranged from 5.3 ppm (corn grain) to 104 ppm (wheat germ). Measurable fluoride anion residues occurred in most control samples; the residue levels varied from one commodity to another and ranged from 0.03 to 2.08 ppm.

Processing studies conducted with whole grain corn and whole grain wheat showed that residues of fluoride concentrate in wheat shorts (1.26X), wheat bran (2.56X), wheat germ (4.82X), and corn "impurities" (5.49X). Impurities are described as being similar to aspirated grain fractions. The processed cereal grain commodities were generated using simulated commercial practices. Sulfuryl fluoride analyses were not done for commodities processed from treated grain samples. This is not considered to be a data gaps since sulfuryl fluoride is not expected to survive the milling process.

*Dried Fruits and Tree Nuts.* In dried fruits and tree nuts, residue levels of sulfuryl fluoride varied based on the commodity and the treatment regime. For most commodities, residues had dissipated to <2.1 ppb within 6 days of active aeration (1.5 chamber volumes/min) following fumigation. Sulfuryl fluoride residues were more persistent in commodities with higher oil content (e.g, walnuts, pecans, almonds), typically requiring closer to 14 days for residues to dissipate to <2.1 ppb. At the same fumigation rate, residues of sulfuryl fluoride were greater following vacuum fumigation versus treatment at ambient pressure. In oily commodities, multiple fumigations resulted in higher residues of sulfuryl fluoride at a given aeration time. Pooled across all of the variables addressed in this study, sulfuryl fluoride residues ranged from <2.1 ppb to 6030 ppb (6.03 ppm). Residue levels of fluoride were measured only after residues of sulfuryl fluoride had dissipated to below detectable levels; therefore, the effect of aeration time on fluoride levels cannot be assessed from these data. Generally, fluoride residues appear to be more dependent on the number of fumigations than on the treatment rate, treatment pressure, or commodity. Overall, fluoride residue levels ranged from <1.4 ppm to 21.8 ppm.

## Recommendations

The residue chemistry databases for both sulfuryl fluoride and fluoride anion are considered marginally adequate to set tolerances based on the proposed use pattern. As a condition of registration, HED is recommending that further residue data are collected to ensure that the tolerances being recommended by HED are appropriate.

## Residue Chemistry Deficiencies

- The number of cereal grain magnitude of the residue studies conducted at the

maximum proposed use rate is marginally adequate. Residue data for both sulfuryl fluoride and fluoride anion should be submitted. The data should be from samples in at least three different grain mills that were treated according to the proposed maximum use. The matrices to be analyzed should include raw and processed commodities of wheat, rice, sorghum, and corn, including corn oil.

- The number of dried nut and tree fruit magnitude of the residue studies conducted at the maximum proposed use rate is marginally adequate. Residue data for both sulfuryl fluoride and fluoride anion should be submitted for representative commodities for these two groups. Samples should be treated according to the proposed maximum use.
- Both HED and the Analytical Chemistry Branch are concerned about the ability of the analytical methods to extract incurred residues. Data showing the ability of the sulfuryl fluoride and fluoride anion methods to extract and accurately quantify incurred residues in raw and processed cereal grain matrices should be submitted. Furthermore, HED is requesting that the sulfuryl fluoride method be validated for corn oil. If the current method proves to be acceptable for corn oil, then the requested label restriction (see below) can be lifted and HED will recommend that a tolerance be established for corn oil.
- The sulfuryl fluoride method has not been shown to be specific to sulfuryl fluoride. An interference study for sulfuryl fluoride should be submitted.
- Cereal grain commodities, including aspirated grain fractions, are significant livestock feed items. Feeding studies were not submitted to determine the extent of secondary residues that may occur in livestock commodities. HED is requesting data showing the transfer of fluoride from feedstuffs into livestock commodities. A feeding study is not being requested for sulfuryl fluoride.
- A revised Section F (Proposed Tolerances) is required.

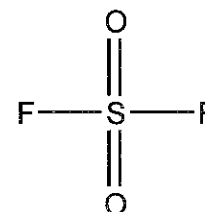
HED notes that data are sufficient to set sulfuryl fluoride and fluoride anion tolerances provided that the following modifications are made to the label:

- The total fumigation rate shall not exceed 1500 mg·hr/L at ambient pressure or 200 mg·hr/L under reduced pressure.
- Active aeration of at least 24 hours at not less than 1 chamber volume/min shall occur for all commodities prior to their entering commerce. This requirement does not apply to mill fumigations since practices to ensure worker safety will result in adequate aeration.
- Corn oil shall be removed from the premises prior to fumigation.

Provided such label changes are made, HED is recommending a conditional registration with the sulfuryl fluoride and fluoride anion tolerances shown in Table 5.

## Background

Dow AgroSciences has requested permanent tolerances for residues of sulfuryl fluoride and fluoride anion resulting from the post-harvest fumigation of stored cereal grains, cereal grain processed commodities, dried fruit, and tree nuts. Sulfuryl fluoride is a potential methyl bromide replacement. Dow



AgroSciences was recently given an experimental use permit for the post-harvest fumigation of walnuts and raisins.

Sulfuryl fluoride is a highly volatile compound with a boiling point of  $-55^{\circ}\text{C}$  and a vapor pressure of 0.02 Torr. At  $20^{\circ}\text{C}$ , sulfuryl fluoride has a vapor density of 4.3 g/L (heavier than air) and is both colorless and odorless. The log  $K_{ow}$  is estimated to be 0.41. Sulfuryl fluoride has a very low solubility in water (0.075 g/100 g). Solubility in other solvents are 0.78 g/100 g in Wesson oil, 1.74 g/100 g in acetone, and 2.12 g/100 g in chloroform.

### 860.1200 Directions for Use

Table 1. Summary of Directions for the Post-harvest Use of Sulfuryl Fluoride from the Proposed Label.						
Applic. Timing, Type, and Equip.	Formulation [EPA Reg. No.]	Applic. Rate (mg·hr/L)	Max. No. Applic. per Season	Max. Seasonal Applic. Rate (mg·hr/L)	Aeration (hours)	Use Directions and Limitations
Post-harvest fumigation of sealed mills, warehouses, chambers, and other storage structures.	ProFume [62719-XXX]	1500 (ambient pressure)	2	3000 (ambient pressure)	24	Food commodities must be aerated for 24 hours prior to entering commerce.
		200 (vacuum fumigation)		400 (vacuum fumigation)		

The proposed label has sufficient information to allow the Agency to evaluate the residue trials in light of the proposed use patterns. Prior to registration, HED is requesting that the label and use manual be modified to specify a maximum fumigation rate of 1500 mg·hr/L at ambient pressure or 200 mg·hr/L at reduced pressure, that commodities be actively aerated (not less than 1 chamber volume/min) for at least 24 hours prior to their entering commerce, and that corn oil be removed from any premises prior to fumigation.

Sulfuryl Fluoride

Summary of Analytical Chemistry and Residue Data

Barcode: D283007

**860.1300 Nature of the Residue - Plants**

DER: None

MARC Decision Memo: None

Nature of the residue studies have not been submitted for sulfuryl fluoride. Following application, sulfuryl fluoride breaks down to form sulfate and fluoride anion. Sulfate is not of toxicological concern. Fluoride anion is of toxicological concern due to potential skeletal fluorosis. The residues of concern for both tolerance enforcement and risk assessment purposes are sulfuryl fluoride and fluoride anion. The lack of nature of the residue studies is not considered to be a deficiency and no further data are required to fulfill this guideline.

**860.1300 Nature of the Residue - Livestock**

DER: None

MARC Decision Memo: None

As with plants, sulfuryl fluoride would be expected to hydrolyze to form sulfate and fluoride anions. The residues of concern in livestock are sulfuryl fluoride and the fluoride anion; however, due to the nature of the sulfuryl fluoride molecule, HED believes it is unlikely that secondary residues of sulfuryl fluoride will occur in livestock commodities. The lack of nature of the residue studies is not considered to be a deficiency and no further data are required to fulfill this guideline.

**860.1340 Residue Analytical Methods**

DER: M. Doherty, 1/13/04, MRID 456032902 (Sulfuryl Fluoride; 45632902.der.wpd)

M. Doherty, 1/13/04, MRID 45603901 (Fluoride anion; 45603901.der.wpd)

*Sulfuryl Fluoride.* The proposed method utilizes headspace analysis to quantitate residues of sulfuryl fluoride. Residues of sulfuryl fluoride are extracted with water in an air-tight blender. The samples are agitated in the blender for five minutes to transfer residues of the highly volatile sulfuryl fluoride from the grain commodity to the headspace above the sample. The headspace is then analyzed for residues of sulfuryl fluoride by injecting an aliquot into a gas chromatograph with electron-capture detection (GC/ECD). The method has been validated using fortification/recovery experiments on wheat, corn, and rice commodities. Fortification levels ranged from 0.008 to 0.08 ppm (0.1 ppm for wheat). Average recoveries and standard deviations were  $88 \pm 14\%$  for wheat,  $94 \pm 16\%$  for corn, and  $82 \pm 11\%$  for rice. Standard deviations at the 0.008-ppm fortification level ranged from 0.00099 to 0.00129 ppm, resulting in calculated limits of detection and quantification of approximately 0.003 and 0.010 ppm, respectively. There were no apparent residues of sulfuryl fluoride in the control samples. Due to the gaseous nature of sulfuryl fluoride, fortifications were made to the headspace above the commodities and not to the commodities themselves. The method has not been radiovalidated and it is unclear if the method will successfully extract incurred residues. The method has not been shown to be specific to sulfuryl fluoride. It is likely that the method would extract and detect other volatile halogenated compounds (e.g., methyl bromide).

The method underwent an independent laboratory validation. After a considerable amount of consultation between the confirming laboratory and Dow AgroSciences, the laboratory was able to successfully validate the method for wheat grain (average recovery =  $104 \pm 10\%$ ) and wheat flour ( $94 \pm 10\%$ ). Other cereal grain commodities were not tested.

The method has been reviewed by the Agency's Analytical Chemistry Branch (ACB; D. Wright Jr., D282408, 8/14/2003). Although the ACB concurs with HED regarding the ability of the method to extract incurred residues and recommends that the petitioner radiovalidate the method, they recommend that OPP accept the data and that an Agency method validation is not required at this time (D. Wright, D282408, 8/14/2003). Furthermore, HED notes that although control samples of corn oil were analyzed, the method was not validated for corn oil. Due to the physicochemical properties of sulfuryl fluoride, oily commodities are the most likely to bear residues following fumigation. In addition to radiovalidation of the method, HED requests that the method performance be verified for corn oil.

*Fluoride Anion.* The method consists of homogenizing and shaking the sample in the presence of water and total ionic strength adjusting buffer, centrifuging the sample, and analyzing an aliquot of the supernatant with a fluoride-selective electrode. Quantitation of fluoride residues is achieved using a double-known-addition technique.

The method was validated by the petitioner using whole grain wheat, whole grain corn, wheat flour, and corn oil. Two independent laboratory validations were performed; the first used whole grain wheat and wheat flour, and the second used corn oil and raisins. Recovery of fluoride was comparable across all tested commodities and between the petitioner validations and the independent laboratory validations. Generally, recovery of fluoride fell within the acceptable range of 70-120% after values were corrected for background levels of fluoride in control samples. Initial laboratory validation experiments showed limits of detection (LOD) and quantification (LOQ) of approximately 0.2 and 0.5 ppm, respectively. During the independent laboratory validation, the LOQ was increased to 2.0 ppm.

As with the sulfuryl fluoride method, the ability of the method to extract incurred residues has not been demonstrated. HED requests that the petitioner characterize the efficacy of the method with respect to incurred residues.

*Conclusions.* Both the sulfuryl fluoride and the fluoride anion methods have undergone review by the Agency's ACB. The ACB recommends that the methods be radiovalidated and that they be accepted without a full method validation.

### 860.1360 Multiresidue Methods

DER: None

Multiresidue method studies have not been submitted to the Agency. Based on their physicochemical properties, neither sulfuryl fluoride nor fluoride anion are likely to be suitable for the multiresidue techniques currently in use. The lack of multiresidue studies is not considered to be a deficiency and no further data are required to fulfill this guideline.



**860.1380 Storage Stability**

DER: M. Doherty, 1/13/04, MRID 455103\_2 (45510302.der.wpd)

*Sulfuryl Fluoride.* Storage stability data for sulfuryl fluoride were not submitted. Sulfuryl fluoride analysis of field trial samples was completed very shortly following the fumigation/aeration of the grain commodities. Storage stability data are not required to support the sulfuryl fluoride residue analysis for the field trial samples because of this short storage interval.

*Fluoride Anion.* Samples of wheat grain, wheat flour, corn grain, corn meal, raisins, and walnuts were individually homogenized and fortified with an aqueous fluoride solution to a concentration of 20 ppm fluoride. The fortified samples were stored at ambient temperatures for 30 days and then placed into frozen (-20°C) storage for the remainder of the study. On Day 0 and approximately Day 35, Day 75, Day 105, and Day 140 after fortification, the storage stability samples, along with a control sample, a reagent blank, and two daily concurrent recovery samples, were analyzed for fluoride anion. Fluoride residues were extracted using an aqueous solution and analyzed using a fluoride ion selective electrode. The reported LOQ for the method is 0.6 ppm for wheat grain, 0.3 ppm for wheat flour, and 0.5 ppm for corn grain. LOQs for other matrices were not given.

Residues of fluoride anion were stable for the duration of the study (~140 days) in wheat grain, corn grain, corn meal, raisins, and walnuts. In wheat flour, however, fluoride residues exhibited a continual decline throughout the study, with only 55% remaining at 140 days. Regression of the residue data indicates a loss of approximately 0.3% per day. The study design does not permit determination of whether or not the loss reflects dissipation of the fluoride residues or an increase in "bound" residues. This loss should be taken into account when interpreting the results of residue studies in wheat flour. HED will not assume that fluoride anion is stable in all commodities. Furthermore, HED notes that the residues in the control samples for all matrices indicate a loss of fluoride with time and that this loss appears to be of the same order of magnitude as that observed in wheat flour. The significance of this trend as it relates to storage stability and field trial results is unclear at this time.

*Conclusions.* The storage stability data support the storage intervals and conditions for samples from the field trial and processing studies.

**860.1400 Water, Fish, and Irrigated Crops**

DER: None

There are no proposed uses for sulfuryl fluoride that would result in residues in fish or irrigated crops. A discussion of the 860.1400 guideline is not germane to this petition.

**860.1460 Food Handling**

DER: None

There are no proposed uses for sulfuryl fluoride in or around food handling areas. A discussion of the 860.1460 guideline is not germane to this petition.

**860.1480 Meat, Milk, Poultry, and Eggs**

DER: None

Studies describing residues of sulfuryl fluoride and fluoride anion in meat, milk, poultry, and eggs have not been submitted to the Agency. Due to the nature of the sulfuryl fluoride molecule, HED believes it is unlikely that secondary residues of sulfuryl fluoride will occur in livestock commodities. The ability of fluoride anion to be transferred from animal feeds to livestock commodities is unclear. Since cereal grain commodities, including aspirated grain fractions, are a major cattle and poultry feed item, HED is requesting that livestock feeding studies be done for the fluoride anion.

**860.1500 Crop Field Trials**

DER: M. Doherty, 1/13/04, MRID 45396301 (45396301.der.wpd)

M. Doherty, 1/13/04, MRID 45510303 (45510303.der.wpd)

M. Doherty, 1/13/04, MRID 45510304 (45510304.der.wpd)

**Cereal Grains**

**Table 2. Summary of Sulfuryl Fluoride Residues in Cereal Grains.** Residue data have been pooled across treatment rate and loading factor. The proposed use pattern is a maximum of 2 fumigations, with a total rate not to exceed 1500 mg-hr/L, and a 24-hour aeration period. Data from more than 2 fumigations or aeration periods greater than 1 day have not been included in this table.

Crop	Form	Location	Temp. (°C)	Fumigation No.	Aeration (days)	n	Sulfuryl Fluoride Residues (ppm)			
							Min	Max	Mean	Std Dev
Corn	Starch	Lab	22	1	1	2	<0.008	<0.008	<0.008	0.000
Corn	Flour	Lab	22	1	1	2	<0.008	<0.008	<0.008	0.000
Corn	Grain	Lab	22	1	1	2	<0.020	0.026	0.023	0.004
Corn	Grits	Lab	22	1	1	2	<0.008	0.014	0.011	0.005
Corn	Meal	Lab	22	1	1	2	<0.008	<0.008	<0.008	0.000
Corn	Oil	Lab	22	1	1	2	5.848	7.840	6.844	1.409
Rice	Bran	Lab	22	1	1	2	<0.008	<0.008	<0.008	0.000
Rice	Hulls	Lab	22	1	1	2	0.056	0.057	0.057	0.001
Rice	Grain	Lab	22	1	1	2	0.016	0.025	0.021	0.007
Rice	Polished	Lab	22	1	1	2	<0.008	<0.008	<0.008	0.000
Wheat	Bran	Lab	22	1	1	2	<0.008	<0.008	<0.008	0.000
Wheat	Flour	Lab	30	1	1	2	<0.008	<0.008	<0.008	0.000
Wheat	Flour	Lab	10	1	1	2	<0.008	<0.008	<0.008	0.000
Wheat	Flour	Lab	22	1	1	10	<0.008	<0.008	<0.008	0.000
Wheat	Flour	Lab	22	2	1	2	<0.008	0.009	0.009	0.001
Wheat	Germ	Lab	22	1	1	10	<0.020	<0.020	<0.020	0.000
Wheat	Germ	Lab	30	1	1	2	<0.020	<0.020	<0.020	0.000

Sulfuryl Fluoride

Summary of Analytical Chemistry and Residue Data

Barcode: D283007

Crop	Form	Location	Temp. (°C)	Fumigation No.	Aeration (days)	n	Sulfuryl Fluoride Residues (ppm)			
							Min	Max	Mean	Std Dev
Wheat	Germ	Lab	10	1	1	2	<0.020	<0.020	<0.020	0.000
Wheat	Germ	Lab	22	2	1	2	<0.020	<0.020	<0.020	0.000
Wheat	Grain	Lab	22	1	1	10	<0.008	0.090	0.021	0.026
Wheat	Grain	Lab	10	1	1	2	0.032	0.033	0.033	0.000
Wheat	Grain	Lab	30	1	1	2	0.013	0.014	0.013	0.001
Wheat	Grain	Lab	22	2	1	2	0.086	0.095	0.091	0.007
Wheat	Red dog	Lab	22	1	1	2	<0.008	<0.008	<0.008	0.000
Wheat	Shorts	Lab	22	1	1	2	<0.008	<0.008	<0.008	0.000

**Table 3. Summary of Fluoride Anion Residues in Cereal Grains.** Residue data have been pooled across loading factor and aeration time. The proposed use pattern is a maximum of 2 fumigations, with a total rate not to exceed 1500 mg-hr/L, and a 24-hour aeration period. Data from rates less than ~1000 or greater than ~1800 mg-hr/L or from more than 2 fumigations have not been included in this table. Bolded rows indicate the maximum residue for each crop/commodity.

Crop	Commodity	Location	Temp. (°C)	Fumig. No.	Rate <sup>A</sup> (mg-hr/L)	n	Fluoride Anion Residues (ppm)			
							Min	Max <sup>B</sup>	Mean	SD
Barley	Grain	Lab	30	1	1646	4	2.76	3.05	2.88	0.13
Barley	Grain	Mill	Amb. <sup>C</sup>	1	1012	4	4.27	9.25	6.27	2.37
Barley	Grain	Mill	Amb.	1	1798	2	6.49	7.96	7.23	1.04
Corn	Flour	Lab	22	1	1500	4	14.90	19.20	17.10	2.26
Corn	Flour	Mill	Amb.	1	1012	4	17.20	24.10	19.35	3.19
Corn	Flour	Mill	Amb.	1	1798	2	22.70	24.10	23.40	0.99
Corn	Grain	Lab	30	1	1436	4	1.31	1.64	1.43	0.15
Corn	Grain	Lab	22	1	1500	4	2.07	2.26	2.18	0.09
Corn	Grain	Lab	30	1	1504	4	0.76	1.41	1.00	0.28
Corn	Grain	Mill	Amb.	1	1012	4	1.00	2.05	1.39	0.48
Corn	Grain	Mill	Amb.	1	1012	4	1.03	5.31	2.43	2.00
Corn	Grain	Mill	Amb.	1	1798	2	1.19	1.52	1.36	0.23
Corn	Grain	Mill	Amb.	1	1798	2	1.71	1.86	1.79	0.11
Corn	Grits	Lab	22	1	1500	4	7.74	9.17	8.57	0.69
Corn	Meal	Lab	22	1	1500	4	5.24	6.30	5.82	0.49
Corn	Meal	Mill	Amb.	1	1012	4	10.50	21.00	14.83	4.66
Corn	Meal	Mill	Amb.	1	1798	2	21.60	26.40	24.00	3.39
Corn	Oil	Lab	22	1	1500	4	<0.50	<0.50	<0.50	0.00
Corn	Starch	Lab	22	1	1500	4	3.82	5.35	4.60	0.84
Oats	Grain	Lab	30	1	1560	4	7.00	8.27	7.54	0.53
Oats	Grain	Mill	Amb.	1	1012	4	6.82	15.25	9.78	3.77
Oats	Grain	Mill	Amb.	1	1798	2	12.50	14.00	13.25	1.06
Rice	Bran	Lab	22	1	1500	4	24.20	28.50	25.90	1.96
Rice	Brown	Lab	30	1	1599	4	2.16	2.38	2.24	0.10
Rice	Brown	Mill	Amb.	1	1012	4	3.84	11.80	6.78	3.60
Rice	Brown	Mill	Amb.	1	1798	2	6.24	7.29	6.77	0.74
Rice	Grain	Lab	22	1	1500	4	5.49	8.46	6.93	1.43
Rice	Hulls	Lab	22	1	1500	4	23.40	32.80	27.53	4.76
Rice	Polished	Lab	22	1	1500	4	1.30	1.60	1.44	0.13
Rice	Polished	Lab	30	1	1547	4	1.83	2.03	1.96	0.09
Rice	Polished	Mill	Amb.	1	1012	4	3.21	16.10	7.44	5.85
Rice	Polished	Mill	Amb.	1	1798	2	7.64	10.70	9.17	2.16
Wheat	Bran	Lab	22	1	1500	4	34.00	37.10	35.95	1.38
Wheat	Flour	Lab	22	1	1000	2	19.30	21.10	20.20	1.27
Wheat	Flour	Lab	10	1	1500	2	14.60	15.70	15.15	0.78
Wheat	Flour	Lab	22	1	1500	18	21.50	44.70	32.57	6.18
Wheat	Flour	Lab	30	1	1500	2	33.40	37.80	35.60	3.11
Wheat	Flour	Lab	22	2	1500	2	62.50	62.60	62.55	0.07
Wheat	Flour	Mill	Amb.	1	1012	4	21.20	49.70	36.48	12.14
Wheat	Flour	Mill	Amb.	1	1798	2	46.4	49.30	47.85	2.05

Sulfuryl Fluoride

Summary of Analytical Chemistry and Residue Data

Barcode: D283007

Crop	Commodity	Location	Temp. (°C)	Fumig. No.	Rate <sup>A</sup> (mg-hr/L)	n	Fluoride Anion Residues (ppm)			
							Min	Max <sup>B</sup>	Mean	SD
Wheat	Flour, Semolina	Mill	Amb.	1	1012	4	13.10	27.30	21.63	6.46
Wheat	Flour, Semolina	Mill	Amb.	1	1798	2	25.50	28.40	26.95	2.05
Wheat	Flour, Unbleached White	Mill	Amb.	1	1012	4	22.90	51.50	37.50	14.89
Wheat	Flour, Unbleached White	Mill	Amb.	1	1012	4	26.00	57.00	39.33	13.17
Wheat	Flour, Unbleached White	Mill	Amb.	1	1798	2	41.70	45.30	43.50	2.55
Wheat	Flour, Unbleached White	Mill	Amb.	1	1798	2	40.40	49.30	44.85	6.29
Wheat	Flour, Whole	Mill	Amb.	1	1012	4	22.40	32.90	26.83	4.50
Wheat	<b>Flour, Whole</b>	<b>Mill</b>	<b>Amb.</b>	<b>1</b>	<b>1012</b>	<b>4</b>	<b>28.10</b>	<b>82.30</b>	<b>44.83</b>	<b>25.48</b>
Wheat	Flour, Whole	Mill	Amb.	1	1798	2	35.60	40.40	38.00	3.39
Wheat	Flour, Whole	Mill	Amb.	1	1798	2	40.50	48.20	44.35	5.44
Wheat	Germ	Lab	22	1	1000	2	55.30	58.60	56.95	2.33
Wheat	Germ	Lab	10	1	1500	2	17.40	18.60	18.00	0.85
Wheat	Germ	Lab	22	1	1500	18	41.60	104.00	67.01	17.86
Wheat	Germ	Lab	30	1	1500	2	72.30	82.60	77.45	7.28
Wheat	<b>Germ</b>	<b>Lab</b>	<b>22</b>	<b>2</b>	<b>1500</b>	<b>2</b>	<b>121.00</b>	<b>158.00</b>	<b>139.50</b>	<b>26.16</b>
Wheat	Germ	Mill	Amb.	1	1012	4	33.40	41.10	38.10	3.31
Wheat	Germ	Mill	Amb.	1	1012	4	41.40	89.70	64.88	24.32
Wheat	Germ	Mill	Amb.	1	1798	2	55.90	63.30	59.60	5.23
Wheat	Germ	Mill	Amb.	1	1798	2	78.80	85.90	82.35	5.02
Wheat	Grain	Lab	22	1	1000	2	1.52	1.74	1.63	0.16
Wheat	Grain	Lab	10	1	1500	2	0.79	0.91	0.85	0.08
Wheat	Grain	Lab	22	1	1500	18	1.47	4.08	2.47	0.84
Wheat	Grain	Lab	30	1	1500	2	2.79	2.96	2.88	0.12
Wheat	Grain	Lab	22	2	1500	2	5.02	5.02	5.02	0.00
Wheat	Grain	Lab	30	1	1713	4	3.38	4.84	4.06	0.62
Wheat	Grain	Lab	30	1	1768	4	1.93	2.24	2.08	0.13
Wheat	Grain	Lab	30	1	1769	4	2.64	3.50	3.03	0.44
Wheat	Grain	Mill	Amb.	1	1012	4	2.98	6.54	4.49	1.57
Wheat	Grain	Mill	Amb.	1	1012	4	2.12	8.36	4.53	2.68
Wheat	<b>Grain</b>	<b>Mill</b>	<b>Amb.</b>	<b>1</b>	<b>1012</b>	<b>4</b>	<b>3.61</b>	<b>23.60</b>	<b>9.19</b>	<b>5.30</b>
Wheat	Grain	Mill	Amb.	1	1798	2	4.84	5.65	5.25	0.57
Wheat	Grain	Mill	Amb.	1	1798	2	4.79	5.80	5.30	0.71
Wheat	Grain	Mill	Amb.	1	1798	2	4.73	6.06	5.40	0.94
Wheat	<b>Red dog</b>	<b>Lab</b>	<b>22</b>	<b>1</b>	<b>1500</b>	<b>4</b>	<b>31.70</b>	<b>33.30</b>	<b>32.50</b>	<b>0.67</b>
Wheat	<b>Shorts</b>	<b>Lab</b>	<b>22</b>	<b>1</b>	<b>1500</b>	<b>4</b>	<b>31.90</b>	<b>35.50</b>	<b>34.18</b>	<b>1.57</b>

<sup>A</sup> For the grain mills, application rates were grouped into categories of <300 mg·hr/L, >300 mg·hr/L and <1200 mg·hr/L, and > 1200 mg·hr/L. The statistics listed for application rate and residue levels are for samples within each application rate grouping.

<sup>B</sup> Due to the design of this study, the maximum residue level and the highest average residue levels are identical.

<sup>C</sup> Amb. = Ambient Temperature

*MRID 45396301.* Studies were conducted to determine the magnitude of sulfuryl fluoride and fluoride anion residues in/on stored grain commodities following fumigation of the commodities with sulfuryl fluoride. The studies were designed to investigate the effects of temperature (10, 22, or 30 °C), number of fumigations (1-4), fumigation rate (250, 1000, 1500, or 2500 mg·hr/L), fumigation chamber loading (1, 10, 50, or 80% of capacity), and aeration time (1, 4, or 7 days; active aeration at approx. 1 chamber volume/min) on sulfuryl fluoride and fluoride anion residues. Residues of sulfuryl fluoride were analyzed using a GC/ECD headspace method. Residues of fluoride anion were analyzed using a fluoride ion selective electrode following the double standard addition technique.

For sulfuryl fluoride, residues were independent of fumigation rate, number of fumigations, temperature, and chamber loading factor. After one day of aeration, residues of sulfuryl fluoride were <LOQ in many commodities and <0.1 ppm in all commodities except corn grits (0.0144 ppm maximum) and corn oil (7.8 ppm maximum). Following four days of aeration,

residues of sulfuryl fluoride were < LOQ in all matrices except corn oil (2.6 ppm maximum) and wheat grain (0.04 ppm maximum; 10 °C only). Quantifiable residue of sulfuryl fluoride persisted in these two commodities even after 7 days of aeration (wheat grain treated at 10 °C only).

For anionic fluoride, residues were independent of chamber loading and aeration time. Residues vary significantly from one commodity to another, with maximum residues observed in wheat germ and wheat flour. The residue values in these commodities are positively correlated with the fumigation rate, fumigation temperature, and the number of fumigations. Quantifiable residues of fluoride anion were found in all matrices except corn oil (<0.5 ppm), further demonstrating the stability of parent sulfuryl fluoride in that matrix.

A large amount of data was submitted to characterize the effects of the fumigation parameters on residue levels. However, within a given set of parameters (i.e., a use pattern), there is very little replication. Pooling data across parameters that do not significantly affect residue levels can be done to increase the number of replicates. Even so, replication is only marginally sufficient to support tolerances for some of the use patterns conducted in this study.

*MRID 45510303.* Controlled laboratory and operational grain mill fumigations using sulfuryl fluoride were conducted with whole cereal grains (hard red winter wheat, soft red winter wheat, durum wheat, medium grain brown rice, medium grain white rice, white field corn, popcorn, barley, and oats) and representative processed commodities (wheat germ, wheat flour, and corn meal; grain mill fumigations only) in order to determine the magnitude of sulfuryl fluoride and fluoride anion residues that occur following treatment with sulfuryl fluoride. In the laboratory, commodities were fumigated for 24 hours at either 200 mg·hr/L or 1500 mg·hr/L and then aerated for 24 hours prior to analysis. In the grain mills, fumigations were for 24 hours at either ~280 mg·hr/L, ~1000 mg·hr/L, or ~1800 mg·hr/L and were followed by a 24-hour active aeration interval. Residues of sulfuryl fluoride were determined using GC/ECD headspace analysis (laboratory studies only). Samples of the laboratory- and the grain mill-treated commodities were analyzed for fluoride anion using aqueous extraction and fluoride selective-ion electrode. Sulfuryl fluoride analysis was completed immediately after the 24-hour aeration period.

Following the 24-hour aeration interval, residues of sulfuryl fluoride were less than the LOQ (0.008 ppm) in all laboratory-fumigated commodities, with the exception of one white corn subsample fumigated at the 1500-mg·hr/L rate. Residues in that sample were 0.019 ppm and dissipated to < 0.008 ppm by 48 hours after fumigation. Residues of sulfuryl fluoride were not determined in samples from the grain mills.

Residues of fluoride anion were dependent upon the sulfuryl fluoride treatment rate. Residues in whole grains from the laboratory fumigations ranged from <0.5 ppm to 2 ppm at the 200-mg·hr/L rate and from 1 ppm to 8 ppm at the 1500-mg·hr/L rate. Residues in/on grains from the mill fumigations ranged from 1 ppm to 8 ppm at the lower rate (~280 mg·hr/L) and from 1 ppm to 24 ppm at the higher rates (~1000 - 1800 mg·hr/L). Residues in processed commodities were higher than those in whole grains and ranged from 7 ppm to 50 ppm at the lower rate and from 11 ppm to 90 ppm at the higher rate. Although there is a fairly high degree of variability

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across treatment replicates, the bulk of the variability in the residue levels appears to be due to properties of the commodities themselves.

There are no specific guidelines regarding the number of trials and replicates required for post-harvest pesticide uses. In the laboratory, two fumigation levels were used (200 and 1500 mg·hr/L) for each commodity and there were four replicates per fumigation level. In the grain mills, three fumigation levels were used (~280, ~1000, and ~1800 mg·hr/L) for each grain and processed commodity and three samples were collected per fumigation. This is equivalent to one trial at each fumigation level for each commodity. Given the residue picture from the entire available database, HED considers this to be a marginally acceptable number of trials for supporting sulfuryl fluoride or fluoride anion tolerances.

### Dried Fruit and Tree Nuts

Table 4. Summary of Residue Data from Crop Fumigation Trials with Sulfuryl Fluoride.								
Treatment ID - Crop	Fumigation Number	Fumigation Rate, mg·hr/L (cumulative rate)	Aeration Time, days	Residue Levels*				
				n	Min.	Max.	Mean	Std. Dev.
Sulfuryl Fluoride, ppb								
A - Almond	1	203	1	4	8.90	12.40	11.03	1.55
A - Almond	1		2	5	1.05	2.10	1.26	0.47
A - Dates	1	208	1	4	1.05	1.05	1.05	0.00
A - Dried Plums	1	219	1	4	1.05	1.05	1.05	0.00
A - Figs	1	197	1	5	1.05	7.20	4.41	2.19
A - Pecans	1	199	1	5	32.20	60.30	46.40	10.85
A - Pecans	1		2	4	17.30	25.30	21.90	3.40
A - Pecans	1		5	4	4.80	7.40	5.53	1.25
A - Pecans	1		8	4	1.05	1.05	1.05	0.00
A - Pistachios	1	214	1	4	1.05	1.05	1.05	0.00
A - Raisins	1	221	1	4	1.05	1.05	1.05	0.00
A - Walnuts	1	217	1	4	67.80	79.00	72.58	5.05
A - Walnuts	1		5	4	1.05	2.10	1.84	0.53
A - Walnuts	1		8	4	1.05	1.05	1.05	0.00
B - Almond	1	1534	1	4	28.00	40.00	33.50	4.93
B - Almond	2	1538 (3072)	1	4	44.00	75.00	57.50	13.63
B - Almond	2		2	5	22.00	55.00	35.20	13.81
B - Almond	2		5	2	7.00	8.10	7.55	0.78
B - Almond	3	1488 (4560)	1	4	107.00	128.00	121.00	9.49
B - Almond	3		5	4	14.00	18.00	15.50	1.91
B - Almond	3		8	4	1.05	2.10	1.84	0.53
B - Almond	3		15	4	1.05	1.05	1.05	0.00
B - Dates	1	1484	1	4	6.10	8.30	7.28	1.09
B - Dates	2	1504 (2988)	1	4	1.05	2.10	1.58	0.61
B - Dates	3		1493 (4481)	1	4	5.20	7.10	6.10
B - Dates	4	1503 (5984)	1	4	8.60	15.00	11.65	2.65
B - Dates	4		5	4	7.50	11.00	9.13	1.45

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Treatment ID - Crop	Fumigation Number	Fumigation Rate, mg·hr/L (cumulative rate)	Aeration Time, days	Residue Levels*				
				n	Min.	Max.	Mean	Std. Dev.
B - Dates	5	1491 (7475)	1	4	13.00	23.00	16.75	4.35
B - Dates	5		2	4	7.50	19.00	13.88	5.54
B - Dates	5		5	4	5.50	16.00	8.85	4.88
B - Dates	5		8	6	1.05	8.00	3.69	2.93
B - Dates	5		15	4	1.05	1.05	1.05	0.00
B - Dried Plums	1	1575	1	4	1.05	1.05	1.05	0.00
B - Dried Plums	2	1504	1	5	1.05	1.05	1.05	0.00
B - Dried Plums	3	1516	1	5	1.05	2.10	1.47	0.58
B - Dried Plums	4	1521	1	4	1.05	1.05	1.05	0.00
B - Figs	1	1462	1	4	33.00	41.00	37.00	4.08
B - Figs	2	1498 (2960)	1	4	11.00	15.00	13.00	1.63
B - Figs	2		2	4	2.10	9.30	5.58	4.02
B - Figs	2		5	2	4.50	5.60	5.05	0.78
B - Pecans	1	1533	1	4	2224.00	2688.00	2407.50	199.71
B - Pecans	1		5	4	99.00	105.00	102.75	2.63
B - Pecans	1		15	4	15.00	20.00	16.50	2.38
B - Pecans	2	1452 (2985)	1	3	4146.00	5532.00	4906.00	702.65
B - Pecans	2		15	4	12.00	16.00	13.75	1.71
B - Pecans	3	1510 (4495)	1	4	4276.00	6030.00	4950.50	842.09
B - Pecans	3		2	4	1304.00	3915.00	2564.00	1187.76
B - Pecans	3		5	4	199.00	261.00	228.50	27.50
B - Pecans	3		8	4	57.00	69.00	62.75	6.65
B - Pecans	3		15	4	1.05	1.05	1.05	0.00
B - Pistachios	1	1517	1	4	252.00	303.00	277.25	22.37
B - Pistachios	1		5	4	18.00	29.00	23.25	4.57
B - Pistachios	2	1507 (3024)	1	4	51.00	70.00	63.25	8.73
B - Pistachios	2		5	4	1.05	1.05	1.05	0.00
B - Pistachios	3	1506 (4530)	1	4	35.00	56.00	44.75	10.81
B - Pistachios	3		2	4	8.10	16.00	12.25	3.85
B - Pistachios	3		5	4	1.05	1.05	1.05	0.00
C - Almond	1	218	1	4	12.00	20.00	15.50	4.12
C - Almond	1		2	4	1.05	8.80	4.56	3.62
C - Almond	1		4	4	1.05	1.05	1.05	0.00
C - Pecans	1	206	1	4	1095.00	1306.00	1182.50	91.03
C - Pecans	1		2	4	369.00	462.00	419.75	46.35
C - Pecans	1		5	4	39.00	55.00	48.00	6.83
C - Pecans	1		8	5	4.50	7.20	5.64	1.04
C - Pecans	1		15	4	1.05	1.05	1.05	0.00
C - Pistachios	1	202	1	5	13.00	26.00	18.20	5.36
C - Pistachios	1		2	4	1.05	1.05	1.05	0.00
C - Walnuts	1	183	1	4	569.00	640.00	602.50	30.09
C - Walnuts	1		2	4	290.00	425.00	362.00	57.17
C - Walnuts	1		5	4	90.00	101.00	94.50	4.80
C - Walnuts	1		8	4	24.00	29.00	26.75	2.63
C - Walnuts	1		15	4	1.05	1.05	1.05	0.00
Fluoride Anion (ppm)								

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				n	Min.	Max.	Mean	Std. Dev.
A - Almond	1	203	2	4	3.20	3.77	3.42	0.26
A - Dates	1	208	6	4	0.70	0.70	0.70	0.00
A - Dried Plums	1	219	1	4	0.70	0.70	0.70	0.00
A - Figs	1	197	1	5	0.70	0.70	0.70	0.00
A - Pecans	1	199	8	4	0.70	1.20	0.95	0.29
A - Pistachios	1	214	5	4	1.20	2.91	1.63	0.86
A - Raisins	1	221	5	5	0.70	0.70	0.70	0.00
A - Walnuts	1	217	9	4	0.70	0.70	0.70	0.00
B - Almond	1	1534	1	4	4.07	5.96	4.66	0.89
B - Almond	2	1538 (3072)	5	4	6.65	7.97	7.37	0.68
B - Almond	3	1488 (4560)	15	4	9.07	9.90	9.51	0.37
B - Dates	1	1484	4	4	0.70	0.70	0.70	0.00
B - Dates	2	1504 (2988)	5	4	0.70	1.20	0.95	0.29
B - Dates	3	1493 (4481)	5	4	1.20	1.20	1.20	0.00
B - Dates	4	1503 (5984)	4	4	0.70	2.74	1.46	0.89
B - Dates	5	1491 (7475)	15	4	1.20	3.09	1.67	0.95
B - Dried Plums	1	1575	2	4	0.70	0.70	0.70	0.00
B - Dried Plums	2	1504 (3079)	2	4	0.70	1.20	1.08	0.25
B - Dried Plums	3	1516 (4595)	4	4	0.70	2.56	1.42	0.80
B - Dried Plums	4	1521 (6116)	5	4	1.20	3.14	1.69	0.97
B - Figs	1	1462	6	4	1.20	1.20	1.20	0.00
B - Figs	2	1498 (2960)	5	4	0.70	2.43	1.26	0.82
B - Pecans	1	1533	13	4	7.72	9.59	8.57	0.79
B - Pecans	2	1452 (2985)	13	4	13.80	17.40	15.45	1.50
B - Pecans	3	1510 (4495)	16	4	19.80	21.80	20.83	1.02
B - Pistachios	1	1517	7	4	3.58	4.56	4.10	0.42
B - Pistachios	2	1507 (3024)	6	4	9.98	12.60	11.05	1.11
B - Pistachios	3	1506 (4530)	5	4	13.20	17.90	15.70	2.05
C - Almond	1	218	7	4	0.70	0.70	0.70	0.00
C - Pecans	1	206	16	4	0.70	1.20	1.08	0.25
C - Pistachios	1	202	3	4	0.70	1.20	0.83	0.25
C - Walnuts	1	183	15	4	0.70	1.20	0.83	0.25

Note that residues are expressed as ppb for sulfuryl fluoride and ppm for fluoride anion. For purposes of



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calculating the summary statistics,  $\frac{1}{2}$  LOD or  $\frac{1}{2}$  LOQ values were used as follows: sulfuryl fluoride  $\frac{1}{2}$  LOD = 1.05 ppb,  $\frac{1}{2}$  LOQ = 2.1 ppb; fluoride anion  $\frac{1}{2}$  LOD = 0.7 ppm,  $\frac{1}{2}$  LOQ = 1.2 ppm.

Supervised post harvest fumigation trials were conducted with walnuts, pistachios, pecans, almonds, dates, figs, dried fruits, and raisins. Single fumigations were carried out at normal atmospheric pressure or under vacuum conditions at rates of approximately 200 mg•hr/L. Additionally, multiple fumigations (2-5) were conducted, each at approximately 1500 mg•hr/L. For each treatment/crop combination, 2 replicate fumigations were made and 2-3 samples were collected from each replicate. The trials monitored residues of sulfuryl fluoride and fluoride anion, as well as the time required for sulfuryl fluoride residues to dissipate to < LOQ (4.2 ng/g). Sulfuryl fluoride residues were analyzed using a head space method; fluoride anion was analyzed using a fluoride selective-ion electrode and a double-known-addition technique. Residue levels of sulfuryl fluoride varied based on the commodity and the treatment regime. For most commodities, residues had dissipated to <2.1 ppb within 6 days of aeration (1.5 chamber volumes/min) following fumigation. Sulfuryl fluoride residues were more persistent in commodities with higher oil content (e.g., walnuts, pecans, almonds), typically requiring closer to 14 days for residues to dissipate to < 2.1 ppb. At the same fumigation rate, residues of sulfuryl fluoride were greater following vacuum fumigation versus treatment at ambient pressure. In oily commodities, multiple fumigations resulted in higher residues of sulfuryl fluoride at a given aeration time. Pooled across all of the variables addressed in this study, sulfuryl fluoride residues ranged from <2.1 ppb to 6030 ppb (0.03 ppm). Residue levels of fluoride were measured only after residues of sulfuryl fluoride had dissipated to below detectable levels; therefore, the effect of aeration time on fluoride levels cannot be assessed from these data. Generally, fluoride residues appear to be more dependent on the number of fumigations than on the treatment rate, treatment pressure, or commodity. Overall, fluoride residue levels ranged from <1.4 ppm to 21.8 ppm.

*Conclusions.* Significant data gaps are associated with these studies. The majority of the maximum fluoride residue levels were found in samples from the grain mill fumigations. Replication within those studies was low and there is a fairly high degree of variation in the residue results. Furthermore, laboratory studies show that fluoride levels accumulate with successive fumigations and the grain mill samples were subjected to only one fumigation. HED is requesting that the petitioner conduct fumigations in at least 3 different grain mills. The studies should include raw and processed commodities of wheat, rice, sorghum, and corn, including corn oil, and both sulfuryl fluoride and fluoride anion should be included in the analyses.

Despite these deficiencies, the submitted residue data are considered sufficient for granting a conditional registration for sulfuryl fluoride and for establishing sulfuryl fluoride and fluoride anion tolerances. Provided the label is changed such that (1) the total fumigation rate does not exceed 1500 mg•hr/L under ambient conditions or 200 mg•hr/L under reduced pressure conditions, and (2) corn oil must be removed from the premises prior to fumigation, the submitted data are sufficient to set sulfuryl fluoride and fluoride anion tolerances for stored cereal grain commodities, dried fruits, and tree nuts.

To determine appropriate tolerance levels for fluoride in/on wheat and corn commodities,

HED has taken the maximum fluoride residue resulting from a single fumigation of between ~1000 and ~1800 mg·hr/L from the appropriately pooled data. The resulting residue level was then corrected for fumigation rate when the maximum residue occurred at a rate below 1500 mg·hr/L. Based on the available data, HED believes that tolerance levels shown in Table 5 are appropriate.

### **860.1520 Processed Food and Feed**

DER: M. Doherty, 1/13/04, MRID 45396301 (45396301.del.wpd)

As part of a study examining the effects of various fumigation parameters on the residue levels of sulfuryl fluoride and fluoride anion in cereal grains, the petitioner included a processing study describing levels of fluoride anion in commodities obtained from the processing of treated wheat and corn grain.

Wheat and corn grain were fumigated under controlled conditions at a rate of 1500 mg·hr/L. Following a 24-hour aeration period, the grain samples were analyzed for fluoride anion levels and shipped to Texas A&M University for processing. Wheat bran and wheat germ showed concentration factors of 2.56X and 4.82X, respectively. Fluoride anion residues in other processed wheat commodities were less than or equal to those in the whole grain. Of the corn commodities, only aspirated grain fractions ("impurities") showed a concentration (5.49X) of fluoride residues. The processed cereal grain commodities were produced using simulated commercial practices.

*Conclusions.* The submitted data indicate that fluoride anion residues concentrate in wheat bran, wheat germ, and corn aspirated grain fractions, and that tolerances separate from those of the unprocessed grains may be appropriate for those commodities. For wheat bran and wheat germ, the tolerances derived from the direct fumigation of those commodities are sufficient to cover residue increases that result from the processing of treated grain. HED is recommending a tolerance for corn, aspirated grain fractions of 55 ppm based on the ~5.5X processing factor and the corn grain tolerance of 10 ppm. HED has used the tolerance value rather than the highest average residue as the basis for the recommended tolerance due to uncertainties in the dataset. Based on the available data, tolerances based on direct-treatment are sufficient to cover residue increases that may result from the processing of treated whole grains.

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**860.1850 Confined Accumulation in Rotational Crops**

DER: None

The requested uses for sulfuryl fluoride are for post-harvest fumigation. There are no rotational crop issues associated with that use pattern and a discussion of the 860.1850 guideline is not germane to this petition.

**860.1900 Field Accumulation in Rotational Crops**

DER: None

The requested uses for sulfuryl fluoride are for post-harvest fumigation. There are no rotational crop issues associated with that use pattern and a discussion of the 860.1900 guideline is not germane to this petition.

**860.1550 Proposed Tolerances**

Due to the simplicity of the sulfuryl fluoride molecule and its breakdown products, the Metabolism Assessment Review Committee has not been consulted in determining the residues of concern for this chemical. Tolerances have been proposed for both sulfuryl fluoride and fluoride anion. These are the residues of toxicological concern. Temporary tolerances have been established under 40 CFR 180.575 (sulfuryl fluoride) and 180.145 (fluoride anion) in order to support an experimental use permit for sulfuryl fluoride fumigation of walnuts and raisins. The petitioner has requested that 40 CFR parts 180.575 and 180.145 be amended as indicated in Table 5. In many cases, HED has recommended higher tolerances than those proposed by the petitioner. HED's tolerance recommendations are also in Table 5. There are no international harmonization issues associated with this petition.

Sulfuryl Fluoride

Summary of Analytical Chemistry and Residue Data

Barcode: D283007

Table 5. Tolerance Summary for Sulfuryl Fluoride			
Commodity	Proposed Tolerance (ppm)	Recommended Tolerance (ppm)	Comments (correct commodity definition)
Sulfuryl Fluoride			
Barley, bran	None	0.05	Translated from wheat, flour
Barley, flour	None	0.05	Translated from wheat, flour
Barley, grain	0.01	0.10	Translated from wheat, grain
Barley, pearled	None	0.05	Translated from wheat, flour
Corn, aspirated grain fractions	None	0.05	Translated from wheat, flour
Corn, field, flour	0.01	0.01	—
Corn, field, grain	0.04	0.05	—
Corn, field, grits	0.01	0.02	—
Corn, field, meal	0.01	0.01	—
Corn, field, refined oil	9	None	Recommend use restriction on corn, oil.
Corn, pop, grain	0.04	0.05	—
Millet, grain	0.05	0.10	Translated from wheat, grain
Oat, flour	0.08	0.05	Translated from wheat, flour
Oat, grain	0.01	0.10	Translated from wheat, grain
Oat, rolled	0.08	0.10	Translated from wheat, grain
Rice, bran	0.01	0.01	—
Rice, brown	0.01	None	Covered by rice, grain
Rice, grain	0.04	0.05	—
Rice, hulls	0.08	0.10	—
Rice, polished	0.01	0.01	—
Rice, wild, grain	0.05	0.05	—
Sorghum, grain	0.05	0.10	Translated from wheat, grain
Triticale, grain	0.05	0.10	Translated from wheat, grain
Wheat, bran	0.01	0.05	Translated from wheat, flour
Wheat, flour	0.03	0.05	—
Wheat, germ	0.01	0.02	—
Wheat, grain	0.05	0.10	—
Wheat, milled by-products	0.01	0.05	Translated from wheat, flour
Wheat, shorts	0.01	0.05	Translated from wheat, flour
Nut, tree, group 14	6	3.0	—

Sulfuryl Fluoride

Summary of Analytical Chemistry and Residue Data

Barcode: D283007

Commodity	Proposed Tolerance (ppm)	Recommended Tolerance (ppm)	Comments (correct commodity definition)
Fruit, dried	—	0.05	A dried fruit group tolerance was not proposed. Tolerances for "fruit, dried" should be proposed and the individual listings omitted.
Dates	0.03	See Fruit, dried	—
Figs	0.05	See Fruit, dried	—
Plums, dried	0.01	See Fruit, dried	—
Raisins	0.01	See Fruit, dried	—
All other dried fruits	0.05	See Fruit, dried	—
Fluoride			
Barley, bran	98	45.0	—
Barley, flour	98	45.0	—
Barley, grain	10	15.0	—
Barley, pearled	98	45.0	—
Corn, aspirated grain fractions	98	55.0	—
Corn, field, flour	26	35.0	Translated from 24 ppm at 1012 mg-hr/L
Corn, field, grain	7	10.0	—
Corn, field, grits	10	10.0	—
Corn, field, meal	28	30.0	Translated from 21 ppm at 1012 mg-hr/L
Corn, field, refined oil	3	None	Recommend use restriction on corn, oil.
Corn, pop, grain	7	10.0	—
Millet, grain	24	40.0	—
Oat, flour	98	75.0	—
Oat, grain	17	25.0	—
Oat, rolled	98	75.0	—
Rice, bran	31	30.0	Translated from 11.8 ppm at 1012 mg-hr/L
Rice, brown	14	20.0	—
Rice, grain	10	12.0	—
Rice, hulls	35	35.0	—
Rice, polished	18	25.0	—
Rice, wild, grain	24	12.0	—
Sorghum, grain	24	40.0	—
Triticale, grain	24	40.0	—
Wheat, bran	40	40.0	—
Wheat, flour	10	125.0	—

Sulfuryl Fluoride

Summary of Analytical Chemistry and Residue Data

Barcode: D283007

Commodity	Proposed Tolerance (ppm)	Recommended Tolerance (ppm)	Comments (correct commodity definition)
Wheat, germ	98	130.0	Translated from 89.7 ppm at 1012 mg·hr/L
Wheat, grain	25	40.0	—
Wheat, milled by-products	98	130.0	Translated from wheat, germ
Wheat, shorts	38	40.0	—
Nut, tree, group 14	30	10.0	—
Fruit, dried, except grape, raisins	—	3.0	A dried fruit group tolerance was not proposed. Tolerances for “fruit, dried” should be proposed and the individual listings omitted.
Dates	5	See Fruit, dried	—
Figs	5	See Fruit, dried	—
Plums, dried	5	See Fruit, dried	—
Raisins	5	7.0	<b>Grape, raisin</b> - This tolerance is higher than other dried fruits because of the potential for fluoride residues from cryolite on this commodity.
All other dried fruits	5	See Fruit, dried	—

cc: M. Doherty, RAB2 Reading File



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Crop Field Trial - Sulfuryl Fluoride and Fluoride in Cereal Grains

Primary Evaluator

Date: 10/14/04

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Chemist

Registration Action Branch 2, HED (7509C)

Approved by

Date: 10/14/04

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Branch Senior Scientist

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**NOTE: This DER corrects the residues reported in the original DER for corn grits. The study volume reported residues of sulfuryl fluoride in units of parts per billion (ppb). The original DER reported the maximum residue in corn grits as 14.4 ppm rather than 14.4 ppb (i.e., 0.0144 ppm).**

### **STUDY REPORTS:**

45396301. Rick, D., Marty, G., Krieger, S. McGuirk, R. (2000) Evaluation of Sulfuryl Fluoride Fumigation Variables on Residue Levels in Crop Commodities: Laboratory Identification Number: 001103. Unpublished study prepared by Dow AgroSciences LLC 108 p.

### **EXECUTIVE SUMMARY:**

Studies were conducted to determine the magnitude of sulfuryl fluoride and fluoride anion residues in/on stored grain commodities following fumigation of the commodities with sulfuryl fluoride. The studies were designed to investigate the effects of temperature (10, 22, or 30 °C), number of fumigations (1-4), fumigation rate (250, 1000, 1500, or 2500 mg•hr/L), fumigation chamber loading (1, 10, 50, or 80% of capacity), and aeration time (1, 4, or 7 days) on sulfuryl fluoride and fluoride anion residues. Residues of sulfuryl fluoride were analyzed using a GC/ECD headspace method. Residues of fluoride anion were analyzed using a fluoride ion selective electrode following the double standard addition technique.

For sulfuryl fluoride, residues were independent of fumigation rate, number of fumigations, temperature, and chamber loading factor. After one day of aeration, residues of sulfuryl fluoride were <LOQ in many commodities and <0.1 ppm in all commodities except corn grits (0.0144 ppm maximum) and corn oil (7.8 ppm maximum). Following four days of aeration, residues of sulfuryl fluoride were <LOQ in all matrices except corn oil (2.6 ppm maximum) and wheat grain (0.04 ppm maximum; 10 °C only). Quantifiable residue of sulfuryl fluoride persisted in these two commodities even after 7 days of aeration (wheat grain 10 °C only).

For anionic fluoride, residues were independent of chamber loading and aeration time. Residues vary significantly from one commodity to another, with maximum residues observed in wheat germ and wheat flour. The residue values in these commodities are positively correlated



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with the fumigation rate, fumigation temperature, and the number of fumigations. Quantifiable residues of fluoride anion were found in all matrices except corn oil (<0.5 ppm), further demonstrating the stability of parent sulfuryl fluoride in that matrix.

### **STUDY/WAIVER ACCEPTABILITY/DEFICIENCIES/CLARIFICATIONS:**

Under the conditions and parameters used in the study, the field trial residue data are classified as scientifically acceptable. A large amount of data was submitted to characterize the effects of the fumigation parameters on residue levels. However, within a given set of parameters (i.e., a use pattern), there is very little replication. Pooling data across parameters that do not significantly affect residue levels can be done to increase the number of replicates.

The acceptability of this study for regulatory purposes is addressed in the forthcoming U.S. EPA Residue Chemistry Summary Document (DP Barcode D283007).

### **COMPLIANCE:**

Signed and dated GLP, quality assurance, and data confidentiality information were provided. There is no claim of confidentiality and all phases of the study followed Good Laboratory Practice standards.

### **A. BACKGROUND INFORMATION**

<b>TABLE A.1. Test Compound Name and Structure</b>		
Chemical Structure	$  \begin{array}{c}  \text{O} \\     \\  \text{F} - \text{S} - \text{F} \\     \\  \text{O}  \end{array}  $	F <sup>-</sup>
Common name	Sulfuryl fluoride	Fluoride
Company experimental name	Sulfuryl fluoride	-none-
IUPAC name		Fluoride
CAS name		Fluoride
CAS #	002699-78	16984-48-8
End-use product/EP	Profume; Vikaner	Profume

<b>TABLE A.2. Physicochemical Properties of the Technical Grade Test Compound. Properties for fluoride were not available.</b>		
Parameter	Value	Reference
Melting point/range	-136°C	Vikaner MSDS
pH	Not Provided	





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**TABLE A.2. Physicochemical Properties of the Technical Grade Test Compound.** Properties for fluoride were not available.

Parameter	Value	Reference
Density	Not Provided	
Water solubility	1.67 g/L	Vikane MSDS
Solvent solubility	Not Provided	
Vapor pressure (10°C)	9150 mm Hg	Vikane MSDS
Dissociation constant (pK <sub>a</sub> )	Not Provided	
Octanol/water partition coefficient Log(K <sub>ow</sub> )	Not Provided	
UV/visible absorption spectrum	Not Provided	

## B. EXPERIMENTAL DESIGN

### B.1. Study Site Information

The fumigations of the grain commodities with sulfuryl fluoride were conducted under laboratory conditions in a series of eight experiments:

- Experiment 1- Evaluate the influence of fumigation, sample collection location, and time on fluoride residue levels in the tested commodities. Dosage = 1500 mg•hr/L. Analytes = sulfuryl fluoride and fluoride anion.
- Experiment 2- Evaluate the influence of chamber loading on fluoride residue levels in the tested commodities. Dosage = 1500 mg•hr/L. Chambers loaded to 1, 50, and 80% of chamber capacity. Analyte = fluoride anion.
- Experiment 3- Evaluate the influence of dose on commodity residue levels. Dosages = 250 mg•hr/L, 1000 mg•hr/L, and 2500 mg•hr/L. Analytes = sulfuryl fluoride and fluoride anion.
- Experiment 4- Evaluate the influence of temperature on commodity residue levels. Dosage = 1500 mg•hr/L. Fumigation temperatures = 10 or 30°C. Analytes = sulfuryl fluoride and fluoride anion.
- Experiment 5- Evaluate the influence of repeat fumigations on commodity residue levels. Dosage = 1500 mg•hr/L. 4 fumigations, each at a 7-day interval. Analytes = sulfuryl fluoride and fluoride anion.
- Experiment 6- Evaluate the influence of vacuum fumigation on commodity residue levels. Dosage = 1500 mg•hr/L. Each commodity was vacuum-fumigated. Analyte = fluoride anion.
- Experiment 7- Evaluate the influence of sulfuryl fluoride concentration and exposure time on commodity fluoride residue levels. Dosage = 1500 mg•hr/L. Analyte = fluoride anion.
- Experiment 8- Evaluate the influence of processing on processed commodity residue fluoride levels. Dosage = 1500 mg•hr/L. Analyte = fluoride anion. Data from Experiment 8 are addressed in a separate DER for processed commodities (45396301.de1.wpd).



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Table B.1.1. Crop, Fumigation, and Sampling Information									
Crop	Matrices	Fumigation <sup>a</sup>				Sampling Procedures			
		Temp. (C)	# of appl.	Dose: CT Rate (mg-hr/L) <sup>b</sup>	Loading Factor (%)	Interval (days) <sup>c</sup>	Location		Number and wt. of samples
							SF	Fluoride	
Experiment 1									
Corn	grain, flour, cornstarch, grits, meal, and oil	22 ± 2.5	1	1500	10	1	Middle	NA	Two, 10-25 g
						4	Middle	Top, Mid, Bottom	
						7 <sup>d</sup>	Middle	Middle	
Wheat	grain, bran, flour, shorts, red dog, and germ	22 ± 2.5	1	1500	10	1	Middle	NA	Two, 10-25 g
						4	Middle	Top, Mid, Bottom	
						7 <sup>d</sup>	Middle	Middle	
Rice	grain, hulls, polished	22 ± 2.5	1	1500	10	1	Middle	NA	Two, 10-25 g
						4	Middle	Top, Mid, Bottom	
						7 <sup>d</sup>	Middle	Middle	
Experiment 2									
Wheat	grain, flour, and germ	22 ± 2.5	1	1500	1	7	NA	Middle	Two, 10-25 g
					50				
					80				
Experiment 3									
Wheat	grain, flour, and germ	22 ± 2.5	1	250	10	1, 4, 7	Middle	Middle <sup>e</sup>	Two, 10-25 g
Wheat	grain, flour, and germ	22 ± 2.5	1	1000	10	1, 4, 7	Middle	Middle <sup>e</sup>	Two, 10-25 g
				2500					
Experiment 4									
Wheat	grain, flour, and germ	10	1	1500	10	1, 4, 7	Middle	Middle <sup>e</sup>	Two, 10-25 g
		30							
Experiment 5									
Wheat	grain, flour, and germ	22 ± 2.5	4 <sup>f</sup>	1500	10	1, 4, 7 <sup>d</sup>	Middle	Middle <sup>e</sup>	Two, 10-25 g
Experiment 6 <sup>g</sup>									
Wheat	grain, flour, and germ	22 ± 2.5	1	1500	10	7	NA	Middle	Two, 10-25 g
Experiment 7									
Wheat	grain, flour, and germ	22 ± 2.5	1	1500	10	7	NA	Middle	Two, 10-25 g

<sup>a</sup> No tank mixes or adjuvants were used.<sup>b</sup> 1 mg-hr/L = 1 oz-h/1000 cu ft.<sup>c</sup> After fumigation, all samples were aerated for 24 hours, which is designated Day 1.<sup>d</sup> Commodities analyzed for sulfuryl fluoride (F) on day 7 only if SF concentrations in day 4 samples were >LOQ (>8ug/kg).<sup>e</sup> Fluoride sampled at 7 day interval only.<sup>f</sup> 7 day interval between fumigations.<sup>g</sup> Fumigation in experiment 6 was conducted at near-vacuum conditions (~100 mm Hg). Fumigation in all other experiments was conducted at normal atmospheric pressure.



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**TABLE B.1.2. Trial Numbers and Geographical Locations**

NAFTA Growing Region	Crop 1			Crop 2			Crop 3		
	Submitted	Requested		Submitted	Requested		Submitted	Requested	
		Canada	US		Canada	US		Canada	US
Not applicable to a post-harvest use pattern.									

## B.2. Sample Handling and Preparation

Following the final fumigation for each of the above-described experiments, the fumigation chambers were aerated with ambient air at approximately 5-10 L/min for 24 hours. The end of the aeration period is designated as Day 1. As rapidly as possible following the aeration period, commodities were analyzed for sulfuryl fluoride for Experiments 1, 3, 4, and 5. Samples were stored at fumigation temperatures and subsequently analyzed for residues of sulfuryl fluoride on Day 4 and Day 7 (if quantifiable residues were found on Day 4). Samples were analyzed for residues of fluoride anion on Day 7 (plus Day 4 for Experiment 1).

## B.3. Analytical Methodology

*Sulfuryl Fluoride.* Residues of sulfuryl fluoride in crop matrices are extracted with water by blending in sealed jars. An aliquot of headspace is removed and immediately injected into a GC equipped with an electron capture detector (ECD). The GC/ECD response is calibrated using an external standard. The reported LOQs for residues of sulfuryl fluoride are 0.008 ppm in/on various grain matrices and 0.02 ppm in/on rice hulls and wheat germ. This method has undergone successful review by the Agency's Analytical Chemistry Branch/BEAD, which has recommended that the method be radiovalidated and that OPP accept the method for tolerance-enforcement purposes.

*Fluoride Anion.* Residues of fluoride anion in crop matrices are extracted with equal volumes of water and Total Ionic Strength Adjusting Buffer (TISAB) by blending in a homogenizer. A sample of the aqueous layer is removed and centrifuged. A fluoride electrode and a single junction reference electrode are placed in the solution, which is stirred during measurement. During the course of measurement, aliquots of a fluoride standard are added to the solution in two separate steps to complete the double known addition. The reported LOQs for residues of fluoride anion are 0.6 ppm in/on various whole grain matrices, 0.3 ppm in/on corn and wheat flour, cornstarch, corn meal and grits, and rice bran, 0.8 ppm in/on rice hulls and wheat bran, germ, "red dog", and shorts, and 0.5 ppm in/on corn oil. This method has undergone successful review by the Agency's Analytical Chemistry Branch/BEAD, which has recommended that the method be radiovalidated and that OPP accept the method for tolerance-enforcement purposes.

## C. RESULTS AND DISCUSSION

There are no recommendations in the OPPTS 860.1500 Guideline pertaining to the



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number of trials that should be submitted to support post-harvest uses of pesticides. The results from these studies reflect investigations into a number of use-pattern variables and, when taken separately, represent very little replication for a specific use pattern. Pooling data across treatment regimes is appropriate for calculating summary statistics (Tables C.4.1 and C.4.2).

Based on the submitted concurrent recovery data, the analytical method for sulfuryl fluoride is adequate for data collection purposes. The analytical method for fluoride anion regularly produces concurrent recoveries that are highly variable and often well in excess of 100%. Fluoride anion concentrations in untreated samples were below the LOQ for all commodities; therefore, background levels of fluoride do not account for the excessive recoveries of fluoride anion. Despite the high recoveries, the fluoride anion analytical method is adequate for data collection purposes due to the inherent variability of ion-specific electrodes.

**Sulfuryl Fluoride.** Residue of sulfuryl fluoride in cereal grains appear to be independent of the fumigation dose and chamber loading factor for the doses and factors included in the residue studies. The independence of residues on fumigation dose is likely due to the prevalence of non-quantifiable levels of sulfuryl fluoride in the cereal grains. The independence on loading factor indicates that during the fumigation process, the fumigant was evenly disbursed throughout the fumigation chamber. After one day of aeration, a number of corn, rice, and wheat commodities had quantifiable levels of sulfuryl fluoride (Table 2.3.1). The highest residues were found in corn grits (14.4 ppm) and corn oil (7.8 ppm). Maximum residues in other commodities after one day of aeration were <0.1 ppm. After four days of aeration, residues of sulfuryl fluoride were below the LOQ (0.003 or 0.02 ppm, depending on the commodity) in all tested commodities with the exceptions of corn oil and wheat grain (10 °C only). Quantifiable residue of sulfuryl fluoride persisted in the commodities even after 7 days of aeration (wheat grain from the 10 °C study only).

**Fluoride Anion.** As with the sulfuryl fluoride residues, residues of fluoride in the cereal grain commodities were independent of fumigation chamber loading. However, fluoride residues are dependent on fumigation dosing level and appear to be positively correlated to fumigation temperature. Residues of fluoride are independent of the aeration time, presumably due to the rapid conversion of labile sulfuryl fluoride residues into stable fluoride anion residues. Fluoride residues are highly dependent on the commodity. The highest residues occurred in wheat flour and germ (Table 2.3.2). The lowest residues were found in corn oil (<0.5 ppm), which further emphasises the stability of parent sulfuryl fluoride in that matrix.

Table C.1. Summary of Concurrent Analytical Method Validation.						
Crop Matrix	Fortification Level (ppm)		Recoveries (%)	Mean Recovery $\pm$ SD	LOD (ppm)	LOQ (ppm)
Experiment 1 – Sulfuryl Fluoride						
Corn Grain	8.0-80.0	82, 100, 73, 114, 105, 116, 111, 110, 104, 102, 117, 124, 107, 86, 101		101 $\pm$ 16	NR	0.008
Corn Flour	8.0-80.0	66, 105, 60, 100, 104, 122, 107, 104, 102, 94, 104, 105, 92, 79, 66		91 $\pm$ 19	NR	0.008



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Crop Matrix	Fortification Level (ppm)	Recoveries (%)	Mean Recovery $\pm$ SD	LOD (ppm)	LOQ (ppm)
Cornstarch	8.0-80.0	91, 90, 82, 82, 85, 88	86 $\pm$ 4	NR	0.008
Corn Grits	8.0-80.0	115, 104, 105, 91, 81, 87, 90, 85, 89, 86, 78, 84	91 $\pm$ 11	NR	0.008
Corn Oil	8.0-80.0	73, 76, 84, 83, 88, 96, 98, 92, 100, 75, 93, 96	88 $\pm$ 9	NR	0.008
Wheat Grain	8.0-80.0	80, 67, 87, 81, 95, 88	83 $\pm$ 10	NR	0.008
Wheat Flour	8.0-80.0	97, 90, 95, 87, 84, 86	90 $\pm$ 5	NR	0.008
Wheat Bran	8.0-80.0	108, 98, 95, 88, 79, 82	92 $\pm$ 11	NR	0.008
Wheat Germ	8.0-80.0	78, 61, 74, 86, 90, 90	80 $\pm$ 11	NR	0.02
Wheat Red Dog	8.0-80.0	85, 84, 94, 98, 91, 90	90 $\pm$ 5	NR	0.008
Wheat Shorts	8.0-80.0	86, 91, 74, 85, 83, 84	84 $\pm$ 6	NR	0.008
Polished Rice	8.0-80.0	100, 104, 89, 93, 97, 90, 84, 66, 61, 72, 76, 89, 91	86 $\pm$ 13	NR	0.008
Rice Bran	8.0-80.0	79, 88, 85, 79, 77, 76, 66, 82, 76, 90, 73, 92, 90, 77, 89, 76, 72, 74, 83	80 $\pm$ 7	NR	0.008
Experiments 3-5 – Sulfuryl Fluoride					
Wheat Grain	8.0-80.0	146, 111, 96, 96, 82, 115, 94, 84, 91, 96, 91, 89, 84, 109, 102, 88, 82	97 $\pm$ 16	NR	0.008
Wheat Flour	8.0-80.0	63, 73, 109, 94, 106, 84, 88, 78, 79, 87, 97, 106, 82, 72, 93, 92, 85, 99	88 $\pm$ 13	NR	0.008
Wheat Germ	20.0-200	122, 83, 93, 81, 75, 89, 81, 70, 76, 79, 80, 76, 94, 88, 75, 83	84 $\pm$ 12	NR	0.02
Experiment 1 – Fluoride Anion					
Corn Grain	0.5-50	179, 124, 116, 90, 98	121 $\pm$ 35	NR	0.6
Corn Flour	0.5-50	183, 139, 103, 76, 114	123 $\pm$ 41	NR	0.3
Cornstarch	0.5-50	111, 116, 103, 109	110 $\pm$ 5	NR	0.3
Corn Meal	0.5-50	139, 112, 101, 90	110 $\pm$ 21	NR	0.3
Corn Grits	0.5-50	136, 106, 91, 99	108 $\pm$ 20	NR	0.3
Corn Oil	0.5-50	122, 121, 111, 101, 97	110 $\pm$ 11	NR	0.5
Wheat Grain	0.5-50	109, 99, 112, 125	111 $\pm$ 11	NR	0.6
Wheat Bran	0.5-50	109, 95, 96	100 $\pm$ 8	NR	0.8
Wheat Flour	0.5-50	97, 107, 125	110 $\pm$ 13	NR	0.3
Wheat Germ	0.5-50	110, 101, 96	102 $\pm$ 7	NR	0.8
Wheat Red Dog	0.5-50	130, 141	136 $\pm$ 8	NR	0.8
Wheat Shorts	0.5-50	129, 126, 180	145 $\pm$ 30	NR	0.8
Wheat Middlings	0.5-50	129	129	NR	0.8
Wheat Impurities	0.5-50	100	100	NR	0.8
Polished Rice	0.5-50	163, 110	137 $\pm$ 37	NR	0.3
Paddy Rice	0.5-50	93, 106	100 $\pm$ 9	NR	0.3
Rice Bran	0.5-50	118, 113	116 $\pm$ 4	NR	0.3
Rice Hulls	0.5-50	101, 103	102 $\pm$ 1	NR	0.8
Experiments 2-7 – Fluoride Anion					



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DACO 7.4.1/OPPTS 860.1100/OECD IIA 6.3.1, 6.3.2, 6.3.3 and IIIA 8.3.1, 8.3.2, 8.3.3

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Crop Matrix	Fortification Level (ppm)	Recoveries (%)	Mean Recovery $\pm$ SD	LOD (ppm)	LOQ (ppm)
Wheat Grain	2	86, 129, 115, 127, 135, 106, 114, 121, 115, 120, 134, 127, 118, 115, 126, 115	119 $\pm$ 12	NR	0.6
Wheat Flour	20	117, 123, 95, 88, 78, 90, 115, 124, 89, 111, 120, 100, 98, 123, 100, 109	105 $\pm$ 15	NR	0.3
Wheat Germ	50	127, 124, 90, 129, 78, 75, 101, 104, 86, 124, 113, 109, 108, 98, 106, 101	104 $\pm$ 16	NR	0.8

Table C.2. Summary of Storage Conditions			
Matrix	RAC or Extract	Storage Temperature ( $^{\circ}$ C)	Duration (days)
Cereal Grains	RAC	2, 10, 22, and 30 for Experiment 4	8 - 21

Table C.3. Residues of Sulfuryl Fluoride and Fluoride Anion in Cereal Grain Commodities following Post-Harvest Fumigation with Sulfuryl Fluoride.								
Crop	Matrix	Fumigation <sup>a</sup>				Sampling Interval (days)	Sulfuryl fluoride Residues (ppm)	Fluoride anion Residues (ppm)
		Temp. (C)	# of samples	Dose: CT Rate (mg-hr/L) <sup>b</sup>	Loading Factor (%)			
Experiment 1								
Corn	grain	22 ± 2.5	1	1500	10	1	0.0257, 0.020	NA
						4	<0.008, <0.008	2.25, 2.26
						7 <sup>c</sup>	<0.008, <0.008	2.07, 2.13
	flour	22 ± 2.5	1	1500	10	1	<0.008, <0.008	NA
						4	<0.008, <0.008	14.9, 15.4
						7 <sup>c</sup>	<0.008, <0.008	18.9, 19.2
	cornstarch	22 ± 2.5	1	1500	10	1	<0.008, <0.008	NA
						4	<0.008, <0.008	3.82, 5.35
						7 <sup>c</sup>	NA	3.91, 5.30
meal	22 ± 2.5	1	1500	10	1	<0.008, <0.008	NA	
					4	<0.008, <0.008	5.60, 6.30	
					7 <sup>c</sup>	NA	5.24, 6.14	



Sulfuryl Fluoride/078003

DACO 7.4.1/OPPTS 860.1500/OECD IIA 6.3.1, 6.3.2, 6.3.3 and IIA 8.3.1, 8.3.2, 8.3.3

Crop Field Trial - Sulfuryl Fluoride and Fluoride in Cereal Grains

Table C.3. Residues of Sulfuryl Fluoride and Fluoride Anion in Cereal Grain Commodities following Post-Harvest Fumigation with Sulfuryl Fluoride.

Crop	Matrix	Fumigation <sup>a</sup>				Sampling Interval (days)	Sulfuryl fluoride Residues (ppm)	Fluoride anion Residues (ppm)
		Temp. (C)	# of appl.	Dose: CT Rate (mg-hr/L) <sup>b</sup>	Loading Factor (%)			
	grits	22 ± 2.5	1	1500	10	1	<0.008, 0.0144	NA
						4	<0.008, <0.008	9.09, 9.17
						7 <sup>c</sup>	NA	7.74, 8.26
	oil	22 ± 2.5	1	1500	10	1	7.840, 5.848	NA
						4	2.664, 2.511	<0.5, <0.5
						7 <sup>c</sup>	4.384, 3.128	<0.5, <0.5
Wheat	grain	22 ± 2.5	1	1500	10	1	0.009, <0.008	NA
						4	<0.008, <0.008	1.94, 1.92
						7 <sup>c</sup>	NA	1.84, 1.93
	bran	22 ± 2.5	1	1500	10	1	<0.008, <0.008	NA
						4	<0.008, <0.008	36.7, 37.1
						7 <sup>c</sup>	NA	34.0, 36.0
	flour	22 ± 2.5	1	1500	10	1	<0.008, <0.008	NA
						4	<0.008, <0.008	29.9, 29.2
						7 <sup>c</sup>	NA	32.2, 33.5
	shorts	22 ± 2.5	1	1500	10	1	<0.008, <0.008	NA
						4	<0.008, <0.008	35.5, 31.9
						7 <sup>c</sup>	NA	34.8, 34.5
	red dog	22 ± 2.5	1	1500	10	1	<0.008, <0.008	NA
						4	<0.008, <0.008	32.7, 31.7
						7 <sup>c</sup>	NA	33.3, 32.3
	germ	22 ± 2.5	1	1500	10	1	<0.020, <0.020	NA
						4	<0.020, <0.020	56.8, 54.2



Sulfuryl Fluoride/078003

DACO 7.4.1/OPPTS 860.1500/OECD IIA 6.3.1, 6.3.2, 6.3.3 and IIIA 8.3.1, 8.3.2, 8.3.3

Crop Field Trial - Sulfuryl Fluoride and Fluoride in Cereal Grains

Table C.3. Residues of Sulfuryl Fluoride and Fluoride Anion in Cereal Grain Commodities following Post-Harvest Fumigation with Sulfuryl Fluoride								
Crop	Matrix	Fumigation <sup>a</sup>				Sampling Interval (days)	Sulfuryl fluoride Residues (ppm)	Fluoride anion Residues (ppm)
		Temp. (C)	# of app	Dose: CT Rate (mg-hr/L) <sup>b</sup>	Loading Factor (%)			
						7°	NA	59.0, 52.0
Rice	Paddy rice grain	22 ± 2.5	1	1500	10	1	0.0251, 0.0159	NA
						4	<0.008, <0.008	5.49, 7.80
						7°	NA	5.97, 8.46
	bran	22 ± 2.5	1	1500	10	1	<0.008, <0.008	NA
						4	<0.008, <0.008	28.5, 24.2
						7°	NA	24.6, 26.3
	polished	22 ± 2.5	1	1500	10	1	<0.008, <0.008	NA
						4	<0.008, <0.008	1.47, 1.60
						7°	NA	1.30, 1.40
	hulls	22 ± 2.5	1	1500	10	1	0.0573, 0.0563	NA
						4	<0.008, <0.008	32.8, 23.6
						7°	<0.008, <0.008	30.3, 23.4
Experiment 2								
Wheat	grain	22 ± 2.5	1	1500	1	7	NA	1.95, 2.00
					50			1.78, 1.85
					80			1.47, 1.99
	flour	22 ± 2.5	1	1500	1	7		33.5, 37.8
					50			21.5, 26.4
					80			25.9, 25.7
	germ	22 ± 2.5	1	1500	1	7		43.5, 41.6
					50			84.1, 83.9
					80			66.3, 73.2
Experiment 3								





Sulfuryl Fluoride/078003

DACO 7.4.1/OPPTS 860.1500/OECD IIA 6.3.1, 6.3.2, 6.3.3 and IIIA 8.3.1, 8.3.2, 8.3.3

Crop Field Trial - Sulfuryl Fluoride and Fluoride in Cereal Grains

Table C.3. Residues of Sulfuryl Fluoride and Fluoride Anion in Cereal Grain Commodities following Post-Harvest Fumigation with Sulfuryl Fluoride.

Crop	Matrix	Fumigation <sup>a</sup>				Sampling Interval (days)	Sulfuryl fluoride Residues (ppm)	Fluoride anion Residues (ppm)
		Temp. (C)	# of appl.	Dose: CT Rate (mg-hr/L) <sup>b</sup>	Loading Factor (%)			
Wheat	grain	22 ± 2.5	1	250	10	1	<0.008, <0.008	NA
						4	<0.008, <0.008	NA
						7	NA	0.68, 0.65
				1000	10	1	0.00849, <0.008	NA
						4	<0.008, <0.008	NA
						7	NA	1.74, 1.52
				2500	10	1	0.0355, 0.0208	NA
						4	<0.008, <0.008	NA
						7	NA	2.03, 1.85
Wheat	flour	22 ± 2.5	1	250	10	1	<0.008, <0.008	NA
						4	<0.008, <0.008	NA
						7	NA	6.88, 7.34
				1000	10	1	<0.008, <0.008	NA
						4	<0.008, <0.008	NA
						7	NA	19.3, 21.1
				2500	10	1	0.00825, <0.008	NA
						4	<0.008, <0.008	NA
						7	NA	39.9, 42.8
Wheat	germ	22 ± 2.5	1	250	10	1	<0.020, <0.020	NA
						4	<0.020, <0.020	NA
						7	NA	18.1, 17.1
				1000	10	1	<0.020, <0.020	NA



Sulfuryl Fluoride/078003

DACO 7.4.1/OPPTS 860.1100/OECD IIA 6.3.1, 6.3.2, 6.3.3 and IIA 8.3.1, 8.3.2, 8.3.3

Crop Field Trial - Sulfuryl Fluoride and Fluoride in Cereal Grains

Table C.3. Residues of Sulfuryl Fluoride and Fluoride Anion in Cereal Grain Commodities following Post-Harvest Fumigation with Sulfuryl Fluoride.

Crop	Matrix	Fumigation <sup>a</sup>				Sampling Interval (days)	Sulfuryl fluoride Residues (ppm)	Fluoride anion Residues (ppm)
		Temp. (C)	# of appl.	Dose: CT Rate (mg-hr/L) <sup>b</sup>	Loading Factor (%)			
						4	<0.020, <0.020	NA
						7	NA	58.6, 55.3
				2500	10	1	<0.020, <0.020	NA
						4	<0.020, <0.020	NA
						7	NA	95.8, 94.2
Experiment 4								
Wheat	grain	10		1500	10	1	0.0328, 0.0323	NA
						4	0.0435, 0.0423	NA
						7	0.0210, 0.0192	0.79, 0.91
		30		1500	10	1	0.0142, 0.0127	NA
						4	<0.008, <0.008	NA
						7	NA	2.79, 2.96
	flour	10		1500	10	1	<0.008, <0.008	NA
						4	<0.008, <0.008	NA
						7	NA	15.7, 14.6
		30		1500	10	1	<0.008, <0.008	NA
						4	<0.008, <0.008	NA
						7	NA	37.8, 33.4
	germ	10		1500	10	1	<0.020, <0.020	NA
						4	<0.020, <0.020	NA
						7	NA	17.4, 18.6
		30		1500	10	1	<0.020, <0.020	NA



Sulfuryl Fluoride/078003

DACO 7.4.1/OPPTS 860.1500/OECD IIA 6.3.1, 6.3.2, 6.3.3 and IIIA 8.3.1, 8.3.2, 8.3.3

Crop Field Trial - Sulfuryl Fluoride and Fluoride in Cereal Grains

Table C.3. Residues of Sulfuryl Fluoride and Fluoride Anion in Cereal Grain Commodities following Post-Harvest Fumigation with Sulfuryl Fluoride.

Crop	Matrix	Fumigation <sup>a</sup>				Sampling Interval (days)	Sulfuryl fluoride Residues (ppm)	Fluoride anion Residues (ppm)
		Temp. (C)	# of appl.	Dose: CT Rate (mg-hr/L) <sup>b</sup>	Loading Factor (%)			
						4	<0.020, <0.020	NA
						7	NA	72.3, 82.6
Experiment 5								
Wheat	grain	22 ± 2.5	1	1500	10	1	0.0108, 0.0902	NA
						4	<0.008, <0.008	NA
						7 <sup>c</sup>	NA	3.10, 3.94
			2	1500	10	1	0.0953, 0.0860	NA
						4	<0.008, <0.008	NA
						7 <sup>c</sup>	NA	5.02, 5.02
			3	1500	10	1	0.0288, 0.0225	NA
						4	<0.008, <0.008	NA
						7 <sup>c</sup>	NA	6.15, 6.31
			4	1500	10	1	0.0214, 0.0232	NA
						4	<0.008, <0.008	NA
						7 <sup>c</sup>	NA	7.95, 8.00
	flour	22 ± 2.5	1	1500	10	1	<0.008, <0.008	NA
						4	<0.008, <0.008	NA
						7 <sup>c</sup>	NA	44.7, 34.2
			2	1500	10	1	0.00844, 0.00936	NA
						4	<0.008, <0.008	NA
						7 <sup>c</sup>	NA	62.5, 62.6
			3	1500	10	1	0.00949, 0.008.52	NA



Sulfuryl Fluoride/078003

DACO 7.4.1/OPPTS 860.1500/OECD IIA 6.3.1, 6.3.2, 6.3.3 and IIIA 8.3.1, 8.3.2, 8.3.3

Crop Field Trial - Sulfuryl Fluoride and Fluoride in Cereal Grains

Table C.3. Residues of Sulfuryl Fluoride and Fluoride Anion in Cereal Grain Commodities following Post-Harvest Fumigation with Sulfuryl Fluoride.

Crop	Matrix	Fumigation <sup>a</sup>				Sampling Interval (days)	Sulfuryl fluoride Residues (ppm)	Fluoride anion Residues (ppm)			
		Temp. (C)	# c app	Dose: CT Rate (mg-hr/L) <sup>b</sup>	Loading Factor (%)						
						4	<0.008, 0.00899	NA			
						7 °	NA	101, 93.7			
						4	1500	10	1	0.0129, 0.015.4	NA
									4	0.00837, <0.008	NA
									7 °	NA	97.1, 93.2
	germ	22 ± 2.5	1	1500	10	1	<0.020, <0.020	NA			
						4	<0.020, <0.020	NA			
						7 °	NA	88.5, 81.9			
				2	1500	10	1	<0.020, <0.020	NA		
							4	<0.020, <0.020	NA		
							7 °	NA	158, 121		
				3	1500	10	1	<0.020, <0.020	NA		
							4	<0.020, <0.020	NA		
							7 °	NA	218, 201		
				4	1500	10	1	<0.020, <0.020	NA		
							4	<0.020, <0.020	NA		
							7 °	NA	235, 222		
Experiment 6 [Fumigation in experiment 6 was conducted at near-vacuum conditions (~100 mm HG).]											
Wheat	grain	22 ± 2.5	1	1500	10	7	NA	3.20, 4.08			
	flour						NA	33.3, 31.6			
	germ						NA	53.7, 54.3			
Experiment 7											
Wheat	grain	22 ± 2.5	1	1500	10	7	NA	3.93, 2.91			
							NA	2.22, 2.36			



Sulfuryl Fluoride/078003

DACO 7.4.1/OPPTS 860.1500/OECD IIA 6.3.1, 6.3.2, 6.3.3 and IIIA 8.3.1, 8.3.2, 8.3.3

Crop Field Trial - Sulfuryl Fluoride and Fluoride in Cereal Grains

Table C.3. Residues of Sulfuryl Fluoride and Fluoride Anion in Cereal Grain Commodities following Post-Harvest Fumigation with Sulfuryl Fluoride.

Crop	Matrix	Fumigation <sup>a</sup>				Sampling Interval (days)	Sulfuryl fluoride Residues (ppm)	Fluoride anion Residues (ppm)
		Temp. (C)	# of appl.	Dose: CT Rate (mg-hr/L) <sup>b</sup>	Loading Factor (%)			
	flour	22 ± 2.5	1	1500	10	7	NA	43.4, 39.9
							NA	28.2, 35.3
	germ	22 ± 2.5	1	1500	10	7	NA	104, 90.3
							NA	58.8, 60.1

<sup>a</sup> No tank mixes or adjuvants were used.<sup>b</sup> 1 mg-hr/L = 1 oz-h/1000 cu ft.<sup>c</sup> Commodities analyzed for sulfuryl fluoride on Day 7 only if sulfuryl fluoride concentration in Day 4 samples were > LOQ (>0.008 ppm).

Table C.4.1. Summary of Sulfuryl Fluoride Residues in Cereal Grains. Residue data have been pooled across dosage level and loading factor.

Crop	Commodity	Temp. (°C)	Fumigation No.	Aeration (days)	n	Sulfuryl Fluoride Residues (ppm)			
						Min	Max	Mean	Std Dev
Corn	cornstarch	22	1	1	2	<0.008	<0.008	<0.008	0.000
Corn	flour	22	1	1	2	<0.008	<0.008	<0.008	0.000
Corn	grain	22	1	1	2	<0.020	0.026	0.023	0.004
Corn	grits	22	1	1	2	<0.008	0.014	0.011	0.005
Corn	meal	22	1	1	2	<0.008	<0.008	<0.008	0.000
Corn	oil	22	1	1	2	5.848	7.840	6.844	1.409
Rice	bran	22	1	1	2	<0.008	<0.008	<0.008	0.000
Rice	hulls	22	1	1	2	0.056	0.057	0.057	0.001
Rice	Paddy rice grain	22	1	1	2	0.016	0.025	0.021	0.007
Rice	polished	22	1	1	2	<0.008	<0.008	<0.008	0.000
Wheat	bran	22	1	1	2	<0.008	<0.008	<0.008	0.000
Wheat	flour	10	1	1	2	<0.008	<0.008	<0.008	0.000
Wheat	flour	30	1	1	2	<0.008	<0.008	<0.008	0.000
Wheat	flour	22	1	1	10	<0.008	<0.008	<0.008	0.000
Wheat	flour	22	2	1	2	<0.008	0.009	0.009	0.001
Wheat	flour	22	3	1	2	0.009	0.009	0.009	0.001
Wheat	flour	22	4	1	2	0.013	0.015	0.014	0.002
Wheat	germ	10	1	1	2	<0.020	<0.020	<0.020	0.000
Wheat	germ	30	1	1	2	<0.020	<0.020	<0.020	0.000
Wheat	germ	22	1	1	10	<0.020	<0.020	<0.020	0.000
Wheat	germ	22	2	1	2	<0.020	<0.020	<0.020	0.000
Wheat	germ	22	3	1	2	<0.020	<0.020	<0.020	0.000
Wheat	germ	22	4	1	2	<0.020	<0.020	<0.020	0.000
Wheat	grain	10	1	1	2	0.032	0.033	0.033	0.000
Wheat	grain	30	1	1	2	0.013	0.014	0.013	0.001
Wheat	grain	22	1	1	10	<0.008	0.090	0.021	0.026
Wheat	grain	22	2	1	2	0.086	0.095	0.091	0.007
Wheat	grain	22	3	1	2	0.023	0.029	0.026	0.004
Wheat	grain	22	4	1	2	0.021	0.023	0.022	0.001



Sulfuryl Fluoride/078003

DACO 7.4.1/OPPTS 860.100/OECD IIA 6.3.1, 6.3.2, 6.3.3 and IIIA 8.3.1, 8.3.2, 8.3.3

Crop Field Trial - Sulfuryl fluoride and Fluoride in Cereal Grains

Crop	Commodity	Temp. (°C)	Fumigation. No.	Aeration (days)	n	Sulfuryl Fluoride Residues (ppm)			
						Min	Max	Mean	Std Dev
Wheat	red dog	22	1	1	2	<0.008	<0.008	<0.008	0.000
Wheat	shorts	22	1	1	2	<0.008	<0.008	<0.008	0.000
Corn	cornstarch	22	1	4	2	<0.008	<0.008	<0.008	0.000
Corn	flour	22	1	4	2	<0.008	<0.008	<0.008	0.000
Corn	grain	22	1	4	2	<0.008	<0.008	<0.008	0.000
Corn	grits	22	1	4	2	<0.008	<0.008	<0.008	0.000
Corn	meal	22	1	4	2	<0.008	<0.008	<0.008	0.000
Corn	oil	22	1	4	2	2.511	2.664	2.588	0.108
Rice	bran	22	1	4	2	<0.008	<0.008	<0.008	0.000
Rice	hulls	22	1	4	2	<0.008	<0.008	<0.008	0.000
Rice	Paddy rice grain	22	1	4	2	<0.008	<0.008	<0.008	0.000
Rice	polished	22	1	4	2	<0.008	<0.008	<0.008	0.000
Wheat	bran	22	1	4	2	<0.008	<0.008	<0.008	0.000
Wheat	flour	10	1	4	2	<0.008	<0.008	<0.008	0.000
Wheat	flour	30	1	4	2	<0.008	<0.008	<0.008	0.000
Wheat	flour	22	1	4	10	<0.008	<0.008	<0.008	0.000
Wheat	flour	22	2	4	2	<0.008	<0.008	<0.008	0.000
Wheat	flour	22	3	4	2	<0.008	0.009	<0.008	0.001
Wheat	flour	22	4	4	2	<0.008	<0.008	<0.008	0.000
Wheat	germ	10	1	4	2	<0.020	<0.020	<0.020	0.000
Wheat	germ	30	1	4	2	<0.020	<0.020	<0.020	0.000
Wheat	germ	22	1	4	10	<0.020	<0.020	<0.020	0.000
Wheat	germ	22	2	4	2	<0.020	<0.020	<0.020	0.000
Wheat	germ	22	3	4	2	<0.020	<0.020	<0.020	0.000
Wheat	germ	22	4	4	2	<0.020	<0.020	<0.020	0.000
Wheat	grain	10	1	4	2	0.042	0.044	0.043	0.001
Wheat	grain	30	1	4	2	<0.008	<0.008	<0.008	0.000
Wheat	grain	22	1	4	10	<0.008	<0.008	<0.008	0.000
Wheat	grain	22	2	4	2	<0.008	<0.008	<0.008	0.000
Wheat	grain	22	3	4	2	<0.008	<0.008	<0.008	0.000
Wheat	grain	22	4	4	2	<0.008	<0.008	<0.008	0.000
Wheat	red dog	22	1	4	2	<0.008	<0.008	<0.008	0.000
Wheat	shorts	22	1	4	2	<0.008	<0.008	<0.008	0.000
Corn	cornstarch	22	1	7	2	NA <sup>A</sup>	NA	NA	NA
Corn	flour	22	1	7	2	<0.008	<0.008	<0.008	0.000
Corn	grain	22	1	7	2	<0.008	<0.008	<0.008	0.000
Corn	grits	22	1	7	2	NA	NA	NA	NA
Corn	meal	22	1	7	2	NA	NA	NA	NA
Corn	oil	22	1	7	2	3.128	4.384	3.756	0.888
Rice	bran	22	1	7	2	NA	NA	NA	NA
Rice	hulls	22	1	7	2	<0.008	<0.008	<0.008	0.000
Rice	Paddy rice grain	22	1	7	2	NA	NA	NA	NA
Rice	polished	22	1	7	2	NA	NA	NA	NA
Wheat	bran	22	1	7	2	NA	NA	NA	NA
Wheat	flour	10	1	7	2	NA	NA	NA	NA
Wheat	flour	30	1	7	2	NA	NA	NA	NA
Wheat	flour	22	1	7	20	NA	NA	NA	NA
Wheat	flour	22	2	7	2	NA	NA	NA	NA
Wheat	flour	22	3	7	2	NA	NA	NA	NA
Wheat	flour	22	4	7	2	NA	NA	NA	NA
Wheat	germ	10	1	7	2	NA	NA	NA	NA



Sulfuryl Fluoride/078003

DACO 7.4.1/OPPTS 860.1500/OECD IIA 6.3.1, 6.3.2, 6.3.3 and IIIA 8.3.1, 8.3.2, 8.3.3

Crop Field Trial - Sulfuryl Fluoride and Fluoride in Cereal Grains

Crop	Commodity	Temp. (°C)	Fumigation No.	Aeration (days)	n	Sulfuryl Fluoride Residues (ppm)			
						Min	Max	Mean	Std Dev
Wheat	germ	30	1	7	2	NA	NA	NA	NA
Wheat	germ	22	1	7	20	NA	NA	NA	NA
Wheat	germ	22	2	7	2	NA	NA	NA	NA
Wheat	germ	22	3	7	2	NA	NA	NA	NA
Wheat	germ	22	4	7	2	NA	NA	NA	NA
Wheat	grain	10	1	7	2	0.019	0.021	0.02	0.001
Wheat	grain	30	1	7	2	NA	NA	NA	NA
Wheat	grain	22	1	7	26	NA	NA	NA	NA
Wheat	grain	22	2	7	2	NA	NA	NA	NA
Wheat	grain	22	3	7	2	NA	NA	NA	NA
Wheat	grain	22	4	7	2	NA	NA	NA	NA
Wheat	red dog	22	1	7	2	NA	NA	NA	NA
Wheat	shorts	22	1	7	2	NA	NA	NA	NA

<sup>A</sup> NA = Not Analyzed.

Table C.4.2. Summary of Fluoride Anion Residues in Cereal Grains. Residue data have been pooled across loading factor and aeration time.

Crop	Commodity	Temp. (°C)	Fumigation No.	Dosage (mg-hr/L)	n	Fluoride Anion Residues (ppm)			
						Min	Max	Mean	SD
Corn	cornstarch	22	1	1500	4	3.82	5.35	4.60	0.84
Corn	flour	22	1	1500	4	14.90	19.20	17.10	2.26
Corn	grain	22	1	1500	4	2.07	2.26	2.18	0.09
Corn	grits	22	1	1500	4	7.74	9.17	8.57	0.69
Corn	meal	22	1	1500	4	5.24	6.30	5.82	0.49
Corn	oil	22	1	1500	4	<0.50	<0.50	<0.50	0.00
Rice	bran	22	1	1500	4	24.20	28.50	25.90	1.96
Rice	hulls	22	1	1500	4	23.40	32.80	27.53	4.76
Rice	Paddy rice grain	22	1	1500	4	5.49	8.46	6.93	1.43
Rice	polished	22	1	1500	4	1.30	1.60	1.44	0.13
Wheat	bran	22	1	1500	4	34.00	37.10	35.95	1.38
Wheat	flour	10	1	1500	2	14.60	15.70	15.15	0.78
Wheat	flour	30	1	1500	2	33.40	37.80	35.60	3.11
Wheat	flour	22	1	250	2	6.88	7.34	7.11	0.33
Wheat	flour	22	1	1000	2	19.30	21.10	20.20	1.27
Wheat	flour	22	1	1500	18	21.50	44.70	32.57	6.18
Wheat	flour	22	1	2500	2	39.90	42.80	41.35	2.05
Wheat	flour	22	2	1500	2	62.50	62.60	62.55	0.07
Wheat	flour	22	3	1500	2	93.70	101.00	97.35	5.16
Wheat	flour	22	4	1500	2	93.20	97.10	95.15	2.76
Wheat	germ	10	1	1500	2	17.40	18.60	18.00	0.85
Wheat	germ	30	1	1500	2	72.30	82.60	77.45	7.28
Wheat	germ	22	1	250	2	17.10	18.10	17.60	0.71
Wheat	germ	22	1	1000	2	55.30	58.60	56.95	2.33
Wheat	germ	22	1	1500	18	41.60	104.00	67.01	17.86
Wheat	germ	22	1	2500	2	94.20	95.80	95.00	1.13
Wheat	germ	22	2	1500	2	121.00	158.00	139.50	26.16
Wheat	germ	22	3	1500	2	201.00	218.00	209.50	12.02
Wheat	germ	22	4	1500	2	222.00	235.00	228.50	9.19
Wheat	grain	10	1	1500	2	0.79	0.91	0.85	0.08
Wheat	grain	30	1	1500	2	2.79	2.96	2.88	0.12



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DACO 7.4.1/OPPTS 860.1000/OECD IIA 6.3.1, 6.3.2, 6.3.3 and IIA 8.3.1, 8.3.2, 8.3.3

Crop Field Trial - Sulfuryl Fluoride and Fluoride in Cereal Grains

Crop	Commodity	Temp. (°C)	Fumigation No.	Dosage (mg-hr/L)	n	Fluoride Anion Residues (ppm)			
						Min	Max	Mean	SD
Wheat	grain	22	1	250	2	0.65	0.68	0.67	0.02
Wheat	grain	22	1	1000	2	1.52	1.74	1.63	0.16
Wheat	grain	22	1	1500	18	1.47	4.08	2.47	0.84
Wheat	grain	22	1	2500	2	1.85	2.03	1.94	0.13
Wheat	grain	22	2	1500	2	5.02	5.02	5.02	0.00
Wheat	grain	22	3	1500	2	6.15	6.31	6.23	0.11
Wheat	grain	22	4	1500	2	7.95	8.00	7.98	0.04
Wheat	red dog	22	1	1500	4	31.70	33.30	32.50	0.67
Wheat	shorts	22	1	1500	4	31.90	35.50	34.18	1.57

#### D. CONCLUSION

Data from these studies indicate that residues of sulfuryl fluoride are not highly dependent upon the treatment rate or loading factor. This is likely due to the combined volatility and high reactivity of the parent compound. Residues of fluoride appear to be independent of the loading factor and the aeration time, indicating that once the sulfuryl fluoride decomposes to form fluoride, that fluoride is rather recalcitrant. Following that line of reasoning, it is not surprising that fluoride content is highly dependent on the treatment rate and number of fumigations.

HED notes that MRID 45510303 also addresses residue levels of fluoride in cereal grain commodities.

#### E. REFERENCES

Analytical Methods: DER 45603001

Storage Stability: DER 45510302

#### F. DOCUMENT TRACKING

RDI: MADoherty (10/16/03); WDeew (10/28/03); RALoranger (10/27/03)

Petition Number(s): PP1F06312

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<b>Chemical:</b>	Sulfuryl fluoride
<b>PC Code:</b>	078003
<b>HED File Code</b>	11000 Chemistry Reviews
<b>Memo Date:</b>	10/12/2004
<b>File ID:</b>	DPD309015
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