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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

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OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: EPA ACCESSION NUMBER None. [RCB # 83, 84, 85, and 86].
Waiver Request for Residue Data Requirements
of the Atrazine Registration Standard dated 10/7/85.
EPA Reg. No. 100-521, 100-529, 100-572, and 100-581.

TO: R. Taylor, PM 25
Registration Division (TS-767)

THRU: Charles L. Trichilo, Chief
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

FROM: R. W. Cook, Chemist *RW Cook*
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

The registrant submits a REQUEST FOR WAIVER OF THE REQUIREMENTS FOR ADDITIONAL RESIDUE CHEMISTRY DATA ON GUAVA IMPOSED BY THE ATRAZINE REGISTRATION STANDARD. The registrant requests that the Agency grant a minor use waiver of residue chemistry requirements.

The Registration Standard for atrazine requires "determinations of atrazine and its chlorometabolites in or on guava fruit following two directed applications of either the 4 lb/gal FlC or a WP formulation at 4 lb ai/A". (Residue Chemistry Chapter, page 39). Further, the Registration Standard provides "Pending toxicological considerations, the tolerances for atrazine residues in or on guava and pineapple should be expressed in terms of combined residues of atrazine and its metabolites G-28273, G-28279, and G-30033 rather than in terms of intact atrazine alone".

Thus, the Standard requires that a) additional residue data for atrazine and its chlorometabolites are needed; and b) that the expression of the tolerance should be changed to include the metabolites. The registrant points out that in FIFRA Section 3(c)(2), the Administrator shall make data requirements for minor uses commensurate with the anticipated extent of use, the pattern of use, and the level and degree of potential exposure to man and the environment. On the basis of this regulatory requirement, the registrant proposes three reasons for waiver of the data requirements.

- 1) Economic basis: Based upon the registrants marketing data, less than 500 pounds of atrazine are sold for use on guava each year. For the years 1982-1984, [REDACTED] pounds of atrazine were sold

COMMERCIAL/FINANCIAL INFORMATION IS NOT INCLUDED

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with gross sales of [REDACTED] Based upon estimated profits [REDACTED] the estimated \$9,000 cost of the requested residue chemistry data would require [REDACTED] to recoup the \$9,000 expenditure to generate the data.

RCB Comments and Conclusions:

The economic bases for regulatory decisions are not within the purview of Residue Chemistry Branch and we will not comment or make any conclusions on the basis of this argument.

2) The registrant points out that residue data for atrazine and its metabolites are available to the Agency for a number of other (unspecified) crops, and that accurate prediction could be made from this data.

RCB Comments and Conclusions:

When the metabolite residue data requested by the Registration Standard on other crops is submitted, these data will be used to support the guava tolerance.

3) The registrant points out that the original tolerance was issued at the request of the IR-4, since guava is considered a minor crop. Recent draft documents have listed guava as a minor crop. The registrant believes that guava should still be considered a minor crop for purposes of establishing tolerances and for the purposes of the Registration Standard.

RCB Comments and Conclusions:

The registrant is correct when he states that the original tolerance was issued on the basis of minor crop or minor use provisions of FIFRA.

We have reexamined the original tolerance request (PP0E2398) and find the following: The use is as a directed application to guava orchard floor, and the label bears instruction to avoid spray on fruit and foliage. Only low levels of atrazine are detected in guava (0.011 ppm or 11 ppb). Metabolites of atrazine would be expected to be correspondingly low. The petitioner (IR-4) changed the requested tolerance level from 0.25 ppm to 0.05 ppm at the request of RCB. The petitioner changed the expression of the tolerance to include parent compound only, at the request of RCB.

Recommendations:

We agree with the registrants conclusion that atrazine metabolite residue data on guava should not be required. When the metabolite residue data requested on other crops is submitted, they will be used to support the tolerance for guava. We recommend that the residue chemistry data for atrazine and its metabolites in or on guava as required in the Registration Standard be waived as requested by the registrant.

cc: R.F., Circu, RWCook, PP0E2398, PMSD/ISB.
TS-769:RCB:Reviewer:RWCook:Date:11/4/85:CM#2:RM:810:557-7377
RDI:Section Head:RSQuick:Date:12/16/85:RSSchmitt:Date:12/17/85

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