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

JAN 15 1988

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

Memorandum

Subject: Triphenyl Tin Hydroxide (TPTH):
Clarification of previously cited
deficiencies; RD Record No. 208184;
RCB No. 3036.

From: Francis B. Suhre, Chemist *Francis B. Suhre*
Special Registration Section II
Residue Chemistry Branch
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Through: Edward Zager, Section Head *E. Zager*
Special Registration Section II
Residue Chemistry Branch
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To: L. Rossi, PM-21
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M&T Chemical Company has requested clarification of several deficiencies, cited in RCB's reviews (S. Hummel, memo dated 9-4-86; and F. Suhre, memos dated 9-1-87, and 9-2-87) of previously submitted residue data for TPTH. The deficiencies, for which M&T Chemical has requested clarification, are listed below, followed by RCB's comments, and conclusions:

M&T Chemical's request for clarification, 1:

1. Item 7b of the September 1 response indicates that the geographical representation of the carrot data is adequate. However, item 4a of the September 2 response indicates that the field ~~trial~~ locations for the carrots do not adequately reflect their geographical production in the U. S. Please clarify this discrepancy.

RCB's Comment:

This apparent discrepancy stems from the registrant's comparison of deficiency 7b cited in RCB's memo of 9-4-86 (S. Hummel, and reiterated by F. Suhre, 9-1-87) with deficiency 4a cited in RCB's memo of 9-2-87 (F. Suhre).

Deficiency 7b states, "The geographic representation of the carrot data appears to be adequate. However, residue data are needed reflecting multiple applications made every seven days beginning 6 weeks after planting. Data reflecting both ground and aerial application are needed."

Deficiency 4a states, "The field locations for peanuts, sugar beets and carrots do not adequately reflect their geographical production in the United States. For peanuts, additional data are required from TX; for sugar beets, additional data are required from CA, ID, WA, NE, WY, and MI; and for carrots, additional data are required from OR/WA. Additionally, much of the submitted residue data do not reflect the minimum label PHIs.....etc" "

Although we understand the registrant's confusion, we think the two deficiencies were viewed somewhat out of context. Deficiency 7b did not address the issue of geographic representation in any detail, whereas, deficiency 4a specifically stated where additional field trials are required.

RCB's Conclusion:

CA, TX, MI, and OR/WA represent the major carrot growing regions of the U.S. (Agricultural Statistics, 1985), therefore, residue data are needed from each of these States.

M&T Chemical's request for clarification, 2:

2. Item 7d of the September 1 response indicates that the geographical representation for Sugar Beets data is adequate. However, item 4a of the September 2 response indicates that the field trial locations for the sugar beet data do not adequately reflect geographical production in the U.S. Please clarify this discrepancy.

RCB's Comment:

The apparent discrepancy between deficiency 7d (S. Hummel, memo dated 9-4-86; and reiterated by F. Suhre, memo of 9-4-87) and deficiency 4a (F. Suhre, memo of 9-2-87) is analogous to that described above.

As previously stated, we understand the registrant's confusion, however, we think the two deficiencies were viewed somewhat out of context. Deficiency 7d did not address the issue of geographic representation in any detail, whereas, deficiency 4a specifically stated where additional field trials are required.

RCB's Conclusion:

CA, MN/ND, ID, WA, NE, WY, and MI represent the major sugar beet growing regions of the U.S. (Agricultural Statistics, 1985), therefore, residue data are needed from each of these States.

M&T Chemical's request for clarification, 3:

On page 16 of the September 2 response is the following sentence:

"The established tolerance for TPTH residues in or on pecans (0.05 ppm) may be exceeded and must be raised to 0.02 ppm."

The registrant wants to know if the value 0.02 ppm in the above sentence is a typographical error, and whether the value should appear as 0.2 ppm.

RCB's Comment/Conclusion:

The registrant is correct; the value in the above sentence should be 0.2 ppm.

RCB's Recommendation:

The registrant, M&T Chemicals, Inc., should be made aware of our comments and conclusions. We recommend that a copy of this review be sent to the registrant.

cc:R.F., Circu., Reviewer, TPTH S.F., TPTH SRF (F. Suhre), TPTH Reg. Std. file, PMSD/ISB.

RDI:EZ:1 /12/88:RDS:1/13/88

TS-769:RCB:FBS:fbs:557-1883:CM#2:RM814:1/14/88