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

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

FEB 9 1983

MEMORANDUM

SUBJECT: PP#2F2681. Present Status on the Proposed Use of Lasso ME (encapsulating alachlor) on various crops.

FROM: John H. Onley, Ph.D., Chemist *John H. Onley*
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

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

TO: Robert Taylor, Product Manager #25
Herbicide-Fungicide Branch
Registration Division (TS-767)
and
Toxicology Branch
Hazard Evaluation Division (TS-769)

In our 1/12/83 review of the 10/27/83 amendment to PP#2F2681, RCB indicated that the petitioner needed to resolve the following deficiencies:

1. Residue data have been submitted that reflected one preplant or one preemergence treatment per year; certain segments of the label "as written" allow for more than one treatment. Each segment of the label should specify the number of treatments.
2. The corn studies reflecting preemergence treatment in the present petition demonstrated that an alachlor tolerance of 8 ppm may be needed for corn forage. The petitioner should repeat the corn studies that were carried out in the state of Iowa.
3. We reserve our conclusions on the adequacies of the established tolerances on soybeans, drybeans, peas, potatoes, and green lima beans until those deficiencies related to the proposed labels/Section B have been resolved.

4. The petitioner should be informed that we can extrapolate residue data from the soybean studies to dry beans, green lima beans, and peas; however, we can not extrapolate the residue data from the soybean studies [to cotton. The petitioner will need to submit residue data reflecting the use of the encapsulating material - alachlor - on cotton.]
5. Alachlor secondary residues in meat, milk, poultry and eggs have been placed under category 2 of Section 180.6(a). We reserve our conclusion until a later date as to whether or not the established 0.02 ppm alachlor tolerance will be adequate for the proposed use of Lasso ME. We want to alert the petitioner that a higher level cattle feeding study may be needed.

On January 17, 1983 (after the completion of our 1/12/83 review of the aforementioned amendment), RCB met with the petitioner; each of the above deficiencies was discussed.

With regard to deficiency no. 1 above, the petitioner indicated that there were two cases where the label can be interpreted incorrectly; therefore, new labels/Section B are now being prepared.

With regard to deficiency no. 2, the petitioner argued that we should disregard the residue data on samples collected at Adel, Iowa. The petitioner was informed that we had previously concluded that an 8 ppm tolerance on corn forage was adequate; he could possibly go ahead and ask for the 8 ppm tolerance if it is toxicological supported and could at a later time lower his tolerance on corn forage if his new residue data could support this request. The petitioner was also told that he had already been alerted (memo of 10/30/80-PP#0F2338) that a higher level feeding study may be needed. The petitioner indicated that he understood this suggestion, but he wanted a guarantee in writing that if the new data showed high residues values in corn, RCB would disregard them. I told the petitioner that the other alternative would be to delete the corn use on the label at this time and reinstate it after he has completed his new corn residue study, and any final opinion on this manner would have to be forwarded as a Branch recommendation. The petitioner was not satisfied with any of the above.

With regard to deficiency no. 3, I told the petitioner that if deficiency no. 1 above was resolved satisfactorily then RCB could make a conclusion on the adequacies of the

established tolerances on soybeans, dry beans, peas, potatoes, and green lima beans.

With regard to deficiency no. 4, [REDACTED]

With regard to deficiency no. 5, the petitioner indicated that he did not want to carry out a new cattle feeding study.

Our Comments/Conclusions

Deficiency No. 1. We are waiting for the petitioner to submit his revised Section B/labels.

Deficiency No. 2. Residue Chemistry Branch has reevaluated alachlor residue data on corn in PP#s 9F0740, 0F2348, and 2F2681.

The petitioner has asked us to discard all of the high residue value on corn forage (maximum value is 7.53 pm) found in PP#2F2681. We have decided not to consider (for tolerance consideration) the Adel, Iowa study showing high values on corn forage/fodder in the subject petition (PP#2F2681). This is because, (1) the residue values seem to be unusually high in this one study and (2) while the petitioner believes the high values in this study are the result of contamination, he cannot document this.

We have also considered all of the corn residue data submitted in PP#s 9F0740 and 0F2348, and have concluded that a 2.0 ppm tolerance for corn forage and fodder would be adequate.

The petitioner will need to submit a new petition for alachlor on corn wherein an alachlor tolerance of 2.0 ppm is proposed on corn forage and fodder. This tolerance cannot be proposed here because this petition is for an exemption for an encapsulating material.

Further, a PHI of 63 days (9 weeks) will need to be observed for all types (field, pop, and sweet) of corn forages; thus, the grazing restriction of 21 days following the Lasso plus Princep tank mixture treatment will need to be changed to 63 days.

PENDING REGISTRATION INFORMATION HAS BEEN DELETED.

Deficiency No. 3:

We are waiting for the petitioner to submit his revised Section B.

Deficiency No. 4:

The petitioner has decided to withdraw [REDACTED]
[REDACTED] This deficiency is moot.

Deficiency No. 5:

With regard to the proposed use, we have placed alachlor secondary residues in meat, milk, poultry, and eggs under category 2 of Section 180.6(a).

Addendum:

At our suggestion, the petitioner has requested a 1.0 ppm alachlor tolerance on soybean hay; previously, the residues on soybean hay were not covered by a tolerance. We want to inform the petitioner that this request would require a new petition number; the petitioner should work with his Product Manager (R. Taylor, EPA) in order to resolve this issue.

Recommendations:

We recommend against the proposed exemption and uses. A favorable RCB recommendation for the use of alachlor ME on soybeans, dry beans, peas, potatoes, green lima beans, and corn requires the petitioner to submit a revised Section B/labels (see our Comments/Conclusions to deficiencies 1, 3 and 4 above); a revised Section F (See Our Comments/Conclusions to deficiency 4 above). Also, an alachlor petition should be submitted to resolve the questions on corn and soybeans (see deficiency 2 and the Addendum, respectively).

TS-769:RCB: J. Onley:CM#2:Rm810:X77377:2/7/83
cc: RF, Circ., J. Onley, Thompson, FDA, TOX, EEB, EFB,
PP#2F2681
RDI: Quick, 1/26/83, Schmitt, 1/26/83

PENDING REGISTRATION INFORMATION HAS BEEN DELETED.