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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
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OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

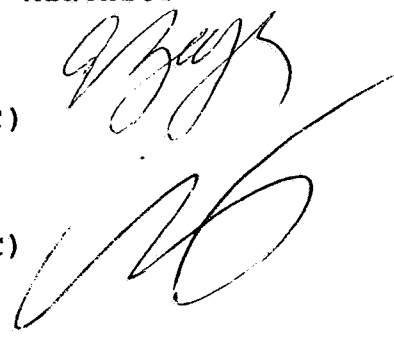
MEMORANDUM

SUBJECT: Canadian Maximum Residue Limits for Alachlor

FROM: Edward Zager, Section Head  
Residue Chemistry Branch  
Hazard Evaluation Division (TS-769C)

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

TO: Kirk Herath, Env. Prot. Spec.  
PSPO (TS-766C)

Two handwritten signatures are present to the right of the memorandum text. The top signature appears to be "E. Zager" and the bottom signature is less legible but likely belongs to Charles L. Trichilo.

These are RCB comments on the major issues connected with the Canadian proposal to establish lower MRL's for alachlor following our meeting on this subject on 6/13/88.

The United States regulatory scientists should have the opportunity to review the technical support document for the proposed action. We would like to provide more detailed comments following review of the technical support document that is the basis for the proposed Canadian action.

1. The United States would like to ascertain that the same data base: residue data, analytical methodology and animal metabolism studies is available to both countries.
2. Some commodities treated in the United States in accordance with good agricultural practice may be in violation of the Canadian MRL's. The United States registered uses allow sequential applications (2 x 4 lbs/A) to soybeans and corn. We would like to know whether these were considered in establishing the Canadian limits.

3. The United States is very interested in verifying that the analytical methods used in Canada can be used routinely to enforce some of the lower limits proposed at 0.02 ppm and particularly the meat and milk limit of 0.001 ppm. We are currently not aware of methodology that can be used routinely at these low levels.

cc: Alachlor SF, RF, Alachlor SR File, Jan Auerbach SRB, PMSD/ISB,  
Zager/Hummel, (RCB), A. Lindsay, (PSPO), A. Barton, (HED)