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

OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM      JAN 7 1983

TO:                    Mr. Robert Taylor, PM #25  
                          Registration Division (TS-767)

SUBJECT:            Oryzalin - Metabolism Data  
                          CASWELL #623 A

Toxicology Branch acknowledges receipt of the study entitled "Excretion and Metabolism of EL-119 by Rats, Rabbits and Ducks" (Oct. 1972 - Acc. #248352) which was previously submitted and reviewed in 1972 (Acc. #093606). It contains useful information concerning the rate and major routes of excretion. However, a general metabolism study (performed in accordance with the 1978 EPA Guidelines) was requested by Dr. M.L. Quaife (1/7/81 and 1/23/81) and required to be submitted (letter to Company from Mr. R. Taylor, 4/16/81). Indications are that Elanco had agreed to submit the requested data, in light of the fact that the above study had already been submitted in 1972.

Proper characterization and identification of the metabolites and associated metabolic pathway has still not been adequately evaluated in animals.

To date, practically all of the tolerance considerations have resulted in favorable recommendations because data demonstrate residues at or below the method sensitivity. However, TB supports the conclusions of RCB with regard to characterization of metabolism of oryzalin in animals and the possible need for more definitive data should it be demonstrated that measureable residues do occur in either animal feed or human consumption RACs (see RCB reviews of PP#2G2612, Loranger, 10/19/82 and 6/18/82).

On this basis TB is deferring a decision on the necessity for a general metabolism study (previously requested) until such time as significant residues from proposed and/or new uses are determined by RCB. Subject metabolism study (if needed) should be performed in accordance with currently accepted methods for performance of such studies.

*Robert B. Jaeger 12/23/82*  
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*11/17/82*