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

AUG 6 1982

OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

Subject: Reg. #241-243 Prowl on wheat/barley crop grouping.

From: R. Quick, Chemist  
Residue Chemistry Branch *R. Quick*  
Hazard Evaluation Division (TS-769)

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

To: Product Manager 25,  
Registration Division (TS-767)

and

Toxicology Branch  
Hazard Evaluation Division (TS-769)

This submission is a letter confirming the residue chemistry discussion held at the meeting of 12/23/81.

The letter confirms their (American Cyanamid) understanding of the data requirements for grain crops and sugarcane. We concur with their statements on these crops in the letter. We should point out that any finding of residues in sugarcane would also necessitate the submission of residue data for molasses and bagasse.

We agree with the Company's understanding that all Prowl samples need not be analyzed for the alcohol metabolite; only three or four field studies per crop need include analysis for the metabolite.

For guidance on the selection of representative crops for crop grouping tolerances for leafy crops, cole crops and curcurbits we recommend that the Company refer to the crop grouping poposal recently published in the Federal Register.

TS-769:RCB:Quick:vg:CM#2:Rm810:X77377:8/4/82  
cc: RF, Circ., Quick,  
RDI: Schmitt, 8/4/82

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