4-20-83

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

APR 20 1983

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: 83-UT-02. Proposed Sec. 18 exemption for the use of Bayleton on tomatoes in Utah. Addendum to our March 31, 1983 review.

FROM: A.R. Rathman, Chemist
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

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

TO: Emergency Response Section
Registration Division (TS-767)

and

Toxicology Branch
Hazard Evaluation Division (TS-769)

In our initial review of this Sec. 18 request, we recommended favorably contingent upon restricting the use to fresh market tomatoes only. This recommendation was made because of the lack of data for tomato byproducts; specifically tomato pomace, and as a result meat and milk considerations could not be made. ERS has now requested that we make a worst case estimate for possible residues in the pomace and further secondary residues in meat and milk.

In our March 31, 1983 review, we concluded that residues would not exceed 0.5 ppm (although we recommended for 2 ppm action level to be consistant with a earlier California Sec. 18 request). We will use the 0.5 ppm level for the calculations.

We are using a 100 fold concentration factor from data submitted in PP# 8F2099 (Permethrin/tomatoes). This results

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in 50 ppm in tomato pomace. Pomace may comprise 25% of the diet of beef and dairy cattle, 10% for horses, and 20% for lambs. The wet pomace may be fed to swine at 10% of the diet and in a few cases to poultry; however, we are not going to consider poultry because of the state involved and the limited acreage (250) to be treated. The maximum level that may be present in dairy or meat animals would be 12.5 ppm.

A review of the Bayleton feeding data is in the A. Smith memo of PP# 2F2665 dated September 9, 1982. From a 25 ppm feeding level (the lowest level fed), milk residues were 0.004-0.014 ppm. Residues in tissues (from the same feeding level) were 0.09 ppm in liver, 0.41 ppm in kidney, 0.024 ppm in fat and <0.01 ppm in muscle. From this, we conclude that maximum residues in milk would be 0.01 ppm and maximum residues in meat, fat, and meat byproducts of cattle, goats, hogs, horses, and sheep would be 0.2 ppm from the proposed use on tomatoes.

Conclusions

1. Maximum calculated residues in dried tomato pomace will be 50 ppm.

2. Maximum residues in milk will be 0.01 ppm and maximum residues in the meat, fat, and meat byproducts of cattle, goats, hogs, horses, and sheep will be 0.2 ppm as a result of the proposed use on tomatoes.

Recommendation

TOX considerations permitting and providing an administrative agreement is made with FDA and USDA, we have no objections to the granting of this Sec. 18 request.

cc: R.F.
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Rathman
83-UT-02
Amended Use File
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