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

APR 14 1982

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

Subject: Memo of Conference of 3/31/82.
From: R. Perfetti, Chemist
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)
Thru: Charles L. Trichilo, Chief
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)
To: RCB Files

Attendees: N. Redfearn Du Pont
E. Raleigh Du Pont
R. Holt Du Pont
R. Fisher Du Pont
C. McIntosh Du Pont
A. Dizard SPRD
J. Auerbach SPRD
J. Ackerman RD
D. Dickson RD
C. L. Trichilo RCB/HED
R. Perfetti RCB/HED

The petitioner came in to discuss PP#2F2604 chlorsulfuron on wheat, oats and barley. The following are our answers to the petitioner's questions.

- 1) Since TOX (C. Frick) concluded at this meeting that they would not be concerned over the identity of up to 0.022 ppm (kidney) of unidentified radioactive residue in tissue and up to 0.011 ppm in milk we will no longer require an additional ruminant metabolism study at this time.

- 2) We will reconsider our poultry metabolism study requirement in light of the TOX conclusion in (1) above. We will defer to TOX the question of whether they would be concerned over unidentified residues in poultry and eggs given the fact that no detectable residues were observed in grain which is the only poultry feed item. Depending on the outcome of this deferral, poultry and eggs may be classed in category 3 of Section 180.6(a). Also, the petitioner claimed that they were informed by M. Nelson on 3/15/82 that if no detectable residues of a pesticide were observed in grain, no poultry metabolism studies were required. M. Nelson confirmed this with the qualifier that she put certain conditions on the answer.
- 3) The petitioner will submit a rationale regarding the low recoveries in meat and milk which will contend that the newly modified method for parent compound which showed increased recoveries in wheat will also show increased recoveries in meat and milk.
- 4) I will initiate a method trial for wheat, meat and milk when the amendment to the petition is assigned to me and I look it over to assure that all major deficiencies are resolved.
- 5) We could not speak for BFSB, but the method trial could possibly be performed at Du Pont's labs since special equipment (specifically a new type detector) is required for the method.
- 6) Given the low application rates aerial data is not needed at this time.
- 7) The 0.05 and 0.5 ppm tolerance levels for grain and straw should still be proposed. A level higher than 6 ppm will probably be needed for forage. Ten parts per million may be acceptable for this commodity.

- 8) Our question regarding conclusion 5b is resolved.
- 9) The petitioner should submit the raw residue data sheets.
- 10) The 0.1 and 0.3 ppm levels for milk and meat should still be proposed.

The conference ended at this time.

TS-769:RCB:R.Perfetti:MCH:CM#2:RM810:X77484

cc: RF., Circu., Chlorsulfuron S.F., PP#2F2604, C. L. Trichilo,
R. Perfetti

RDI: Quick, 4/7/82; Schmitt, 4/7/82