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

JUL 10 1989

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: EPA Reg. No. 352-435. Amended registration request to allow for late season application of Ally^R Herbicide (metsulfuron methyl) to wheat and barley. No MRID No. DEB No. 5180.

FROM: Linda S. Propst, Chemist
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THRU: Andrew R. Rathman, Section Head
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TO: Robert J. Taylor, PM 25
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E. I. DuPont de Nemours and Company has requested an amended registration for Ally^R Herbicide which would allow for a late-season aerial use on wheat and barley that would aid in the harvesting of grain by providing control of weeds that have germinated during the growing season.

Tolerances are established for the combined residues of the herbicide metsulfuron methyl (methyl 2-[[[(4-methoxy-6-methyl-1,3,5-triazin-2-yl)amino]carbonyl]amino]sulfonyl]benzoate) and its metabolite methyl 2-[[[(4-methoxy-6-methyl-1,3,5-triazin-2-yl)amino]carbonyl]amino]sulfonyl]-4-hydroxybenzoate in or on the following raw material agricultural commodities:

Barley, grain	0.05 ppm
Barley, green forage	5.00 ppm
Barley, hay	20.00 ppm
Barley, straw	0.10 ppm
Wheat, grain	0.05 ppm
Wheat, green forage	5.00 ppm
Wheat, hay	20.00 ppm
Wheat, straw	0.10 ppm

Tolerances are established for residues of metsulfuron methyl (methyl-2[[[(4-methoxy-6-methyl-1,3,5-triazin-2-yl)amino]carbonyl]amino]sulfonyl]benzoate) in or on the following raw agricultural commodities:

Cattle, fat	0.1 ppm
Cattle, meat	0.1 ppm
Cattle meat by-products	0.1 ppm
Goats, fat	0.1 ppm
Goats, meat	0.1 ppm
Goats, meat by-products	0.1 ppm
Hogs, fat	0.1 ppm
Hogs, meat	0.1 ppm

40 CFR 180.428

The proposed use would allow for Ally^R at 1/10 ounce product (.06 oz. a.i.) per acre + 2,4-D (amine or ester) to be used as a harvest aid on wheat and barley grown in the states of Colorado, Idaho, Kansas, Nebraska, New Mexico, Oklahoma, South Dakota, Texas, Utah, and Wyoming. Apply this preharvest treatment once crop is in the dough stage (color of stem joints are white) but no later than 20 days prior to harvest. Do not use more than 1/10 oz. of Ally per acre per crop period in Central Kansas, Oklahoma, and North Central Texas. In all other areas, use not more than 1/10 oz. of Ally per acre in a 22 month period. Do not feed treated straw to livestock.

This proposed amended registration is not intended to allow multiple applications of Ally^R but instead is intended as an alternate application interval.

There was no submission of residue data with this request. Data submitted in conjunction with PP#4F3127 reflect residues for parent and Metabolite A on wheat, and barley grain and straw from the major barley and wheat growing areas of California, Colorado, Delaware, Idaho, Illinois, Kansas, North Dakota, Montana, Ohio, Oklahoma, Oregon, South Dakota, and Washington State. PHI's on wheat grain and straw ranged from 38 - 327 days. There is one data point for parent and Metabolite A on barley grain with a 21 day PHI.

While we do not expect combined residues of metsulfuron methyl (parent + Metabolite A) resulting from the proposed amended registration to exceed the established tolerances on wheat and barley grain, there is no residue data available to allow us to make a final conclusion as to the adequacy of the established tolerances.

Restrictions on the feeding of treated straw to livestock are not practical.

Conclusions and Recommendations

In the absence of appropriate residue data, Dietary Exposure Branch is unable to conclude that the tolerances established to cover residues of metsulfuron methyl (parent + Metabolite A) on barley grain, wheat grain, barley straw and wheat straw will not be exceeded as a result of the proposed amended registration.

For a favorable recommendation, data reflecting residues of metsulfuron methyl (parent + Metabolite A) occurring on barley grain, wheat grain, barley straw and wheat straw as a result of the proposed amended registration using the maximum recommended application rate and a 20 day PHI will need to be submitted.

cc: Reading File, Circulation, Subject File, Reviewer, Amended
Registration File, PMSD/ISB

RDI: A. R. Rathman, 7/10/89; R. D. Schmitt, 7/10/89

H7509C:DEB:LSP:lsp:CM-2:Rm803C:557-7324:7/10/89