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

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

AUG 10 1989

MEMORANDUM:

SUBJECT: PP#8F3647: Metsulfuron Methyl (Escort) in or on Grass Forage and Fodder, Grass Hay, and Kidney. Amendment of June 2, 1989. Revised Sections B and F. No MRID No. DEB No. 5587

FROM: J. Garbus, Chemist *Joel Garbus*
Tolerance Petition Section III
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THRU: P. Errico, Head *P. Errico*
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Dietary Exposure Branch
Health Effects Division (H7509c)

TO: R. Taylor / V. Walters PM-25
Registration Division (H7505c)

In petition 8F3674 the Du Pont Company proposed tolerances for the combined residues of the herbicide metsulfuron methyl (Escort) and its metabolite on grass forage and fodder of 15 ppm and on grass hay of 30 ppm. Tolerances for secondary residues for the parent only were proposed for milk of 0.20 ppm and for kidney o 0.50 ppm.

Outstanding Deficiencies in this Memo

All deficiencies have been satisfied for this petition. We can recommend favorably for the requested tolerance as stated below under Conclusions and Recommendations.

DEB (J. Garbus, memo, 3/30/89) concluded that for a favorable recommendation the petitioner would need to submit revised Sections B and F correcting deficiencies identified in the petition. The deficiencies are restated below, together with the petitioner's responses and our comments.

Conclusion 3. Grass seed screenings from grasses grown for seed are used as an animal feedstuff. If metsulfuron methyl were to be used on grasses grown for seed, it will be necessary for the

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registrant to submit data on residues in grass seed screenings. Alternatively the registrant can submit a revised Section B with a restriction against the use of metsulfuron on grasses grown for seed.

Petitioner's Response

The petitioner has added a restriction to the label: "Do not use on grasses grown for seed."

Comment:

The deficiency is satisfactorily resolved.

Conclusion 4.

The residue data submitted with this petition supports tolerances of 15 ppm on grass forage, fodder, and hay and 0.50 ppm in kidney of cattle, goats, hogs, horses, and sheep.

Sufficient data has been supplied for the tolerance request to apply to the crop grouping "Grass, forage, fodder, and hay" [180.34(xvii)]. If the registrant wishes, the tolerance can be expressed in the terms of the crop grouping. Appropriate language for the tolerance is given below.

Existing tolerances for metsulfuron methyl are adequate for other animal commodities including milk. The requested milk tolerance should be withdrawn. A revised Section F should be submitted as [follows].

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 raw agricultural commodities comprising the crop grouping "Grass, forage, fodder, and hay":

Grass, forage, fodder, and hay: 15 ppm

and 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 raw agricultural commodities:

Kidney of cattle, goats, hogs, horses, and sheep: 0.50 ppm

Petitioner's Response

The petitioner has submitted a revised Section F as follows:

It is proposed that tolerances be established for;

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residues of 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-hydroxy benzoate in or on the following raw agricultural commodities:

Grass, forage, fodder, and hay: [sic] 15 ppm
and 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:

Kidney of cattle, goats, hogs, horses, and sheep: 0.5 ppm

The petitioner stated in a separate paragraph that they wish to request the tolerance for the crop grouping "grass forage, fodder, and hay group". Therefore, if and when the tolerance is established it should be written as follows:

Grass forage, fodder, and hay group 15 ppm

Comment:

The revised Section F follows the tolerance expression recommended in DEB's memo and is therefore suitable.

Conclusion and Recommendation

The petitioner has resolved the deficiencies noted in DEB's review of PP8F3647.

DEB can now recommend for the establishment of the tolerances for metsulfuron methyl on the crop grouping "Grass, forage, fodder, and hay": at 15 ppm and for the increased tolerance for "Kidney of cattle, goats, hogs, horses, and sheep" at 0.5 ppm.

cc: R.F., S.F., PP#8F3647, Reviewer, Circ., R. Schmitt, PMSD/ISB
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