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

AUG 30 1994

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MEMORANDUM:

SUBJECT: PP2E4057. Glufosinate-ammonium (Ignite) in or on Bananas for an Import Tolerance. Comments on Draft Federal Register Notice.

CBTS #: 14183 (No DP Barcode #; No MRID)

FROM: María Isabel Rodríguez, Chemist
Tolerance Petition Section III
Chemistry Branch I - Tolerance Support
Health Effects Division (7509C)

*María Isabel Rodríguez
August 30, 1994*

THROUGH: Richard A. Loranger, Ph.D., Chief
Chemistry Branch I - Tolerance Support
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R. Loranger

TO: Joanne Miller/Jesse Mayes
Product Manager #23
Registration Division (7505C)

CBTS reviewed the pertinent Residue Chemistry parts of the Draft *Federal Register* (FR) Notice for a glufosinate-ammonium tolerance in or on the raw agricultural commodity bananas and has several comments.

If a common name has not been accepted by the American National Standard Institute (ANSI), it should not be used in the *Federal Register* or in 40 CFR §180. The CBTS is not certain if the name glufosinate ammonium has been accepted or even submitted for acceptance at ANSI. Therefore, instead of glufosinate ammonium, the chemical name of the pesticide should be used. Therefore, the following changes should be made in the *Federal Register* regarding this matter.

* In the Title (Page 1), the following expression should be used "Pesticide Tolerance for ammonium-DL-homoalanine-4-yl (methyl phosphinate)." instead of "...for glufosinate ammonium."



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* In the Summary Section (Page 1) and the Supplementary Information Section (Page 2), the expression "glufosinate ammonium" should be deleted and only the chemical name of the pesticide used.

* In the Supplementary Information Section (Page 3 - Point #10 and two paragraphs below - and Page 4), the expression "glufosinate ammonium" should be substituted for the chemical name of the pesticide, "ammonium-DL-homoalanine-4-yl (methyl phosphinate)."

* In the Table for §180.XXX Section (Page 5), the expression "Glufosinate Ammonium; tolerances for residues." should be substituted by the expression "Tolerances for the combined residues of ammonium-DL-homoalanine-4-yl (methyl phosphinate), and its metabolite 3-methylphosphinopropionic acid expressed as DL-homoalanine-4-yl-(methyl-phosphinic) acid equivalents."

In the Summary Section (Page 1), the word "import" should be deleted. Instead, the word "imported" should be inserted in the expression "...in or on the raw agricultural commodities..." in order for it to read "...in or on the 'imported' raw agricultural commodities..." in the same sentence. The word "imported" should also be inserted in the Supplementary Information Section (Page 2) in order to have that same expression.

In the Summary Section (Page 1), the word "fresh" should be deleted from the expression. It should read "...bananas at 0.3 ppm...".

In the Summary Section (Page 1) and the Supplementary Information Section (Page 3), the metabolite name should read "3-methylphosphinopropionic acid" instead of the separated word.

It should be noted that CBTS's records show that submissions regarding the subject petition were done by Hoechst-Celanese Corporation and not AgrEVO Corporation as the Draft FR Notice shows. This should be reviewed and corrected, if necessary, on the Summary Section (Page 1) and the Supplementary Information Section (Page 2).

In the Supplementary Information Section (Page 4), the following information should be added:

* A sentence on the metabolism in plants should be added on the second paragraph. The sentence should be "The metabolism of ammonium-DL-homoalanine-4-yl (methyl phosphinate) in plants is adequately understood."

* The third paragraph should be on the analytical

methodology. It should be "An adequate analytical method, gas chromatography with flame photometric detection (P-mode), is available for enforcement purposes. Because of the long lead time from establishing this tolerance to publication of the enforcement methodology in the *Pesticide Analytical Manual*, Vol. II, the analytical methodology is being made available in the interim to anyone interested in pesticide enforcement when requested from: Calvin Furlow, Public Response and Program Resource Branch, Field Operations Division (7506C), Office of Pesticide Programs, Environmental Protection Agency, 401 M St., SW., Washington, DC 20460. Office location and telephone number: Room 242, CM#2, 1921 Jefferson Davis Highway, Arlington, VA 22202, (703-305-4432)."

In the Table for §180.XXX Section (Page 5):

* It should be clear that 0.3 parts per million has the restriction that "Not more than 0.2 ppm shall be present in the pulp after peel is removed." Therefore, the statement should be added to the table.

* A footnote should be added to the tolerance expression in order to alert 40 CFR §180.XXX users that this is a tolerance on an imported commodity. The expression should be "There are no U.S. registrations as of August 24, 1994 for bananas."

For your convenience, the pertinent sections have been marked in the submitted copy of the Draft *FR Notice*. The CBTS concurs with the submitted Draft *FR Notice* provided the comments are incorporated as necessary.

If you have any questions, do not hesitate to contact us.

cc: MIRodríguez, PP#2E4057, Reading File.
RDI: PVerico (8-30-94), JGarbus (8-23-94)
MFlood (8-23-94), RALoranger (8-24-94/8-30-94)
MIRodríguez: Draft (8-17-94), Edited (8-30-94)
7509C/CBTS/CM#2, Room 804-T/703-305-6710

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