

US EPA ARCHIVE DOCUMENT

JUN 11 1987

Mr. Eliot I. Harrison
Delta Management Group
Fenwick Professional Park
1414 Fenwick Lane
Silver Spring, MD 20910

Dear Mr. Harrison:

Subject: Propel
EPA File Symbol 9018-A ✓
EPA Pesticide Petition No. 7F3472
Re: Brea Agricultural Service, Inc.
Stockton, CA 95201

We have partially completed our review of the above application. The following is a list of our comments/conclusions by discipline. We will notify you of the results of the remaining reviews when completed.

Exposure Assessment

1. No environmental fate data will be required because of the volume of data on this compound and its natural occurrence in the environment.
2. The waiver requests for Hydrolysis, Photolysis (on soil and in water), Aerobic and Anaerobic Soil Metabolism, Leaching, Adsorption/Desorption, Soil Dissipation, and Accumulation studies are granted.

Product Chemistry

1. The following data requirements have been satisfied:
 - 61-1 - Product Identity/Disclosure of Ingredients
 - 61-2 - Beginning Materials/Manufacturing Process
 - 61-3 - Formation of Impurities
 - 62-1 - Preliminary Analysis
 - 62-3 - Analytical Methods to Verify Certified Limits
 - 63-2 to 63-13 - Physical/Chemical Characteristics

94413:I:Miller:T-5:KENCO:06/09/87:06/18/87:de:sjh:vo:ek:de

		CONCURRENCES					
SYMBOL	ORIGINATOR						
	TS-262C						
SURNAME	J. Miller						
DATE	6-11-87						

2. 62-2 - Certification of Ingredient Limits

The petitioner needs to define which grade of lactic acid from Purac serves as the technical product for Propel. The grade should be listed on the Confidential Statement of Formula. The upper and lower certified limits for each impurity in the technical product must be provided.

3. Samples of the following materials should be submitted for EPA evaluation:

- a. Analytical Standard;
- b. "Technical" Lactic Acid; and
- c. Formulated product.

Send samples to:

Warren Bontoyan
Analytical Chemistry Laboratory/OPTS
Building 402-ARC East
Beltsville, MD 20705

If you have any questions about the submittal of samples, contact Ms. Diane Raines at Beltsville at (301) 344-2232.

Residue Chemistry

1. The impurities in the technical mixture and end-use product at the levels given are not expected to present a residue problem in the subject crops when the material is used as proposed.
 2. The nature of the residue in plants and animals is adequately understood. The residue of concern is lactic acid. Lactic acid is a naturally occurring compound in both animals and plants. It is formed and metabolized from/to pyruvic acid in glycolysis. No data gaps exist for metabolism.
 3. No compatibility questions exist with respect to Codex MRL, Canadian, or Mexican tolerances.
 4. No enforcement action is indicated or anticipated; however, several well-established clinical chemistry and AOAC methods for lactic acid exist which can adequately define gross misuse. No method tryout is necessary for the lactic acid methods in the AOAC Book of Methods.
 5. Storage stability of lactic acid residues is not a problem.
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6. The data presented are sufficient to ascertain that residues of lactic acid from the proposed use will not exceed physiologically normal levels in raw agricultural commodities or that which is allowed from inert ingredient applications, or that which is allowed in food production as a generally regarded as safe ingredient; thus, an exemption from tolerance is appropriate.
7. There are no anticipated lactic acid residue problems associated with meat, milk, poultry, eggs, drinking and irrigation water, and in fish and shellfish from the proposed use.
8. Residue Chemistry Branch is not aware of any previous regulatory incidents associated with lactic acid.
9. The Agency does not accept restrictions for wine or raisin grapes only. The label should be general for all grapes. A revised label deleting the "For wine and raisin use" on grapes should be submitted. However, if you choose, we will consider an explanation as to why the proposed label must read "For wine and raisin use" on grapes. Define the term "veraison" used in the directions for use on grapes.

Sincerely yours,

Robert J. Taylor
Product Manager (25)
Fungicide-Herbicide Branch
Registration Division (TS-767C)

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