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

AUG 23 1990
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OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: PP#8F3658. Triasulfuron on Wheat and Barley.
Amendment of November 20, 1989.
MRID 413075-01, -02, -03.
HED No. 0-1548.
DEB No. 6841, 6842.

FROM: Martha J. Bradley, Chemist *M J Bradley*
Dietary Exposure Branch
Health Effects Division (H7509C)

TO: Robert Taylor, PM 25
Herbicide-Fungicide Branch
Registration Division (H7505C)

and
Toxicology Branch
Fungicide Herbicide Support
Health Effects Division (H7509C)

THRU: Richard D. Schmitt, Ph.D., Chief *Richard D. Schmitt*
Dietary Exposure Branch
Health Effects Division (H7509C)

A new chemical review was completed for this chemical on the subject crops (memo 6/22/89) and the petition is pending.

Ciba-Geigy Corporation has responded to the deficiencies listed in our (M. Bradley) review of August 17, 1989. The petitioner has amended the directions for use and tolerance proposals, and has submitted rewritten methodology and a new specificity study.

The deficiencies and the petitioners response are discussed below in the same order as before.

Summary of Deficiencies remaining to be resolved

None

Deficiency 1.

The label indicates under "Precautions" that two applications may be made, separated by at least 60 days. The directions for use of the product do not give any instruction in regard to the split application. Include complete directions for this type of use. Limit the application to winter wheat and barley or submit information to indicate that two applications are possible for spring planted wheat and barley by boot stage. The directions should indicate when to use split application as opposed to the single application or indicate conditions when split applications would be made. The split application dosage rates should also be included in the section under "Rates to Use".

Response 1.

The petitioner has clarified the directions for use for post-emergence to wheat and barley prior to boot stage, pre-emergence to wheat and split applications of half the maximum rate, each application, to winter wheat with the second application no later than boot stage.

Comments/Conclusions

This deficiency has been resolved.

Deficiency 2a.

Methods AG-500 and AG-508 should be revised to include the modifications used by the Analytical Chemistry Branch as stated in L. Cheng memo of March 23, 1989, PP#7G3551.

Method AG-500 should also be revised to include the modifications to allow for a detection limit of 0.01 ppm in wheat and barley grain.

Response 2a.

Methods AG-500 and AG-508 have been revised to include the modifications used by the Analytical Chemistry Branch.

Comments/Conclusions

This deficiency has been resolved.

Deficiency 2b.

The petitioner should show that triasulfuron can be quantitated in the presence of the pesticides in group VII of the

specificity study.

Response 2b.

The petitioner has demonstrated that triasulfuron can be quantitated in the presence of the pesticides in group VII of the specificity study.

Comments/Conclusions

This deficiency has been resolved.

Deficiency 3

Tolerance proposals for triasulfuron residues of 2 ppm in wheat and barley forage and 15 ppm in wheat and barley hay should be submitted.

Response 3

The petitioner has dropped the proposed tolerance for wheat and barley hay (this is consistent with the revised Residue Chemistry Guidelines) and proposes tolerances of 0.02 ppm on wheat and barley grain, 5 ppm on wheat and barley forage, 2 ppm on wheat and barley straw, 0.2 ppm in kidney of cattle, goats, hogs, horses and sheep, 0.1 ppm in meat, fat, and meat by-products, excluding kidney, of cattle, goats, hogs, horses, and sheep and 0.02 ppm in milk.

Comments/Conclusions

The proposed tolerances reflect the maximum residue from the maximum application on wheat and barley forage at 0 day PHI of 4.7 ppm. The maximum residue found on straw from the maximum application rate was 1.03 ppm. It is unlikely that wheat or barley would be used for forage until after the boot stage of growth; therefore, we conclude that the proposed tolerances on wheat and barley are not likely to be exceeded from the proposed use.

The diet of beef and dairy cattle will be much lower than previously calculated, without adding barley and wheat hay; therefore we conclude that the proposed tolerances for meat, milk and meat byproducts are not likely to be exceeded from the proposed use.

This deficiency has been resolved.

Recommendation

DEB recommends for the proposed tolerances for triasulfuron on wheat, barley, meat and milk.

cc: PP8F3658, M. Bradley, RF, Circulate (7), PIB/FOD(Furlow),
DRES/SACB(Kariya), FDA
H7509C:DEB:M Bradley:mb:CM#2:Rm810:557-7324:08/23/90
RDI:RSQuick:08/23/90:RALoranger:08/23/90