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

CASWELL FILE

MAY 20 1992

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OFFICE OF  
PESTICIDES AND TOXIC  
SUBSTANCES

MEMORANDUM

Subject: De Minimis Risk Assessment for Temporary Tolerance and Experimental Use Permit for Tebuconazole on Peanuts.

From: Alberto Protzel, Ph.D. *Albert Protzel 5/20/92*  
Review Section III  
Toxicology Branch II  
Health Effects Division (H7509C)

To: Susan T. Lewis/Julie Fairfax, PM 21  
Fungicide-Herbicide Branch  
Registration Division (H7505C)

Thru: James N. Rowe, Ph.D., Head *James N. Rowe 5/20/92*  
Review Section III  
Toxicology Branch II  
Health Effects Division (H7509C)

and

Marcia van Gemert, Ph.D., Chief *management 5/21/92*  
Toxicology Branch II  
Health Effects Division (H7509C)

Action Requested

Toxicology Branch II (Section III) was requested to review a Miles submission, dated 4/10/92, entitled "Dietary Exposure and Risk Assessment for the Use of Tebuconazole in Peanuts" and determine whether this information allows for the granting of the EUP and temporary tolerance on peanuts. [FOLICUR 3.6 F (3125-EUP-ENN), Tolerance Petitions (9G3817 and 2H562800). DP Barcode D177018, Case 194452, Submission S416118].

Background

The Registrant initially tested tebuconazole for oncogenicity in NMRI mice in the diet at levels 0, 20, 60, or 180 ppm for 21 months (MRID 407009-41, 1/25/88). In the review of this 1988 initial study ("First study", J.N Rowe, DER dated 12/24/88), the reviewer concluded that:

- o Based on the findings reported in the study it appeared that the high-dose treatment (180 ppm) was not high enough to approximate the maximum tolerated dose (MTD) and the study was classified as CORE Supplementary
- o There was a slight (non statistically significant) apparent elevation in male benign, but not malignant liver tumors; the combined incidences of these tumors were within the historical control range.

To satisfy the MTD requirement, the Registrant conducted an additional study with NMRI mice (MRID 421750-01, 12/12/91) administered HWG 1608 in the diet at 0, 500 or 1500 ppm for up to 91 weeks. Based on the findings reported in this study, the reviewer ("Second study", A. Protzel, DER dated 2/20/92) concluded that:

- o The MTD was reached at 500 ppm.
- o The separate and combined incidences of hepatocellular adenomas and hepatocellular carcinomas in males were statistically significant at the high dose and were considered to be treatment-related.
- o The incidence of hepatocellular carcinomas in females was statistically significant at the high dose and was considered to be treatment-related.
- o There was a dose-related increase in the incidence of histiocytic sarcomas in both sexes, without pairwise statistical significance vs. controls.
- o Further evaluation of the histiocytic sarcomas was deferred pending submission of historical control data and the study was classified CORE supplementary.

Contemporary with the Agency's review of the Miles oncogenicity study, a Miles application for EUP on Peanuts [FOLICUR 3.6 F (3125-EUP-ENN), Tolerance Petitions (9G3817 and 2H562800)] was being processed. Concern over the significant incidence of hepatocellular neoplasmas observed in the second study in high-dose mice prompted Toxicology Branch II, Section III, to recommend a delay in granting the EUP pending a determination of the carcinogenic risk posed by the granting of the subject EUP and temporary tolerance in peanuts. In a meeting dated 3/26/92, it was suggested to the Miles representative that a favorable de minimis risk (i.e. an upper bound carcinogenic risk  $\leq 10^{-6}$ ) may allow the subject EUP to be issued for 1992.

The results of such a calculations are summarized below.

A. Results of Registrant's Calculations

a. Q<sub>1</sub>\* Calculation

To analyze the tumor data, the results of the first and second studies were pooled (Table 1) by the Registrant based on the following rationale:

- o Same strain of mouse (Bor:NMRI(SPF-Han))
- o Same supplier.
- o Same duration (21 months).
- o Same testing facility (BAYER AG, Toxicology Division, FRG).
- o Studies were conducted within four years of one another (1984 and 1988).
- o Similarities in non-neoplastic liver effects.
- o Body-weight depression.

Table 1. Pooled<sup>a</sup> mouse liver tumor data (From Miles, 1992, p. 6)

Dose (ppm)	Adenomas	Carcinomas	Combined (Total)
<b>Males</b>			
0	5/97	1/97	6/97
20	2/49	0/49	2/49
60	4/50	0/50	4/50
180	6/49	1/49	6/49
500	2/48	0/48	2/48
1500	17/48	10/48	27/48 <sup>***</sup>
<b>Females</b>			
0	1/96	1/96	2/96
20	0/49	0/49	0/49
60	0/50	0/50	0/50
180	0/50	1/50	1/50
500	0/45	0/45	0/45
1500	2/46	12/46	14/46 <sup>***</sup>

<sup>a</sup> Data from the first study (0, 20, 60, and 180 ppm) and the second study (0, 500, 1500 ppm were pooled)

<sup>\*\*\*</sup>  $p \leq 0.001$ , Fisher's Exact Test.

Based on the data of Table 1 and the TOX-Risk V2.Q (Clement Assoc. Inc) software package, the registrant obtained the values for  $Q_1^*$  shown in Table 2. The value of  $Q_1^*$  equal to  $1.5 \times 10^{-2}$  (mg/kg BW/day)<sup>-1</sup> (the highest), corresponding to combined adenomas carcinomas in males (linearized multistage model), was used for the risk calculations corresponding to a worst case scenario.

Table 2.  $Q_1^*$  values obtained using the data in Table 1 (From Miles, 1992, p. 10).

Tumor type	$Q_1^*$ (mg/kg BW/day) <sup>-1</sup>	Goodness of Fit (p)
<b>Males</b>		
Adenomas	$1.7 \times 10^{-2}$	0.39
Carcinomas	$6.1 \times 10^{-3}$	0.63
Combined Total	$1.5 \times 10^{-2}$	0.45
<b>Females</b>		
Adenomas	$3.2 \times 10^{-3}$	0.73
Carcinomas	$6.4 \times 10^{-3}$	0.65
Combined Total	$5.3 \times 10^{-3}$	0.55

b. Exposure Assessment and Risk Calculations

Two separate dietary exposure analyses, under two different scenarios, were conducted by the Registrant:

- o Analysis 1: The feeding restriction on the label will prevent peanut byproducts from being fed and there will be no secondary residues in meat, milk, poultry or eggs.
- o Analysis 2: Processing byproducts are not covered by the feeding restriction and may be included in livestock diets.

These dietary exposure estimates were based on the nationwide survey of food intake conducted by the U.S. Department of Agriculture's Human Nutrition Information Service. The U.S. EPA is currently using data that were collected during 1977-78 in DRES analyses. The Registrant used the results of the most recent survey, completed in 1987-88. This more recent survey has been criticized on grounds that include a low response rate.

The results of the dietary exposure analysis under the first assumption (Feeding restriction, raw and processed commodities only) are shown in Table 3. The highest exposure (Non-hispanic other than black or white) corresponds to 0.000021 mg/kg BW/day. This exposure corresponds to a life time carcinogenic risk of  $3.1 \times 10^{-7}$  for the worst-case  $Q_1^*$  of  $1.5 \times 10^{-2}$  (mg/kg BW/day)<sup>-1</sup>. This highest life time carcinogenic risk of  $3.10 \times 10^{-7}$  shown in Table 3, and therefore all others in the table, are smaller than the  $1 \times 10^{-6}$  de minimis carcinogenic risk acceptable to the EPA.

The results of the dietary exposure analysis under the second assumption (No feeding restriction) are shown in Table 4. The results, except for round-off, are essentially identical to those shown in Table 3. The highest life-time carcinogenic risk of  $3.16 \times 10^{-7}$  (non-hispanic other than black or white) for the worst-case  $Q_1^*$  of  $1.5 \times 10^{-2}$  (mg/kg BW/day)<sup>-1</sup> is also smaller than the  $1 \times 10^{-6}$  de minimis carcinogenic risk acceptable to the EPA.

Table 3. Registrant's dietary exposure analysis and lifetime carcinogenic risk determination based on an assumed feeding restriction. (Table obtained from Miles, 1992, Appendix 2, Table 2)

MILES  
 EXPOSURE 1-87 ANALYSIS FOR TEBUCONAZOLE (NFCS87/88 DATA)  
 RESIDUE FILE NAME: TEBUC1 ADJUSTMENT FACTOR #2 NOT USED  
 DATE 04-06-1992 DATE RESIDUE FILE LAST UPDATED: 04-06-1992/12:44:05/1

COMMENT 1: TOLERANCES. DOES NOT INCLUDE MMPE. Q\*=0.015

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 TOTAL EXPOSURE BY POPULATION SUBGROUP  
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POPULATION SUBGROUP	TOTAL EXPOSURE	
	MG/KG BODY WT/DAY	LIFE TIME RISK (Q*= 0.015000)
U.S. POP - 48 STATES - ALL SEASONS	0.000015	2.23E-07
U.S. POPULATION - SPRING SEASON	0.000015	2.18E-07
U.S. POPULATION - SUMMER SEASON	0.000016	2.42E-07
U.S. POPULATION - AUTUMN SEASON	0.000015	2.26E-07
U.S. POPULATION - WINTER SEASON	0.000014	2.03E-07
NORTHEAST REGION	0.000013	1.97E-07
NORTH CENTRAL REGION	0.000018	2.71E-07
SOUTHERN REGION	0.000013	1.88E-07
WESTERN REGION	0.000017	2.51E-07
HISPANICS	0.000007	1.10E-07
NON-HISPANIC WHITES	0.000016	2.39E-07
NON-HISPANIC BLACKS	0.000009	1.28E-07
NON-HISPANIC OTHER THAN BLACK OR WHITE	0.000021	3.10E-07
FEMALES (13+/PREGNANT/NOT NURSING)	0.000008	1.13E-07
FEMALES (13+/NURSING)	0.000008	1.17E-07
MALES (13-19 YEARS)	0.000012	1.78E-07
FEMALES (13-19 YRS/NOT PREG. OR NURSING)	0.000008	1.25E-07
MALES (20+ YEARS)	0.000008	1.23E-07
FEMALES (20+ YEARS/NOT PREG. OR NURSING)	0.000008	1.16E-07

Table 4. Registrant's dietary exposure analysis and lifetime carcinogenic risk determination without an assumed feeding restriction. (Table obtained from Miles, 1992, Appendix 3, Table 2)

MILES  
 EXPOSURE 1-87 ANALYSIS FOR TEBUCONAZOLE (NFCS87/88 DATA)  
 RESIDUE FILE NAME: TEBUC2AN ADJUSTMENT FACTOR #2 NOT USED  
 DATE 04-08-1991 DATE RESIDUE FILE LAST UPDATED: 04-06-1992/12:42:00/1

COMMENT 1: TOLERANCES, INCLUDING MMPE - Q\*=0.015

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 TOTAL EXPOSURE BY POPULATION SUBGROUP  
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POPULATION SUBGROUP	TOTAL EXPOSURE	
	MG/KG BODY WT/DAY	LIFE TIME RISK (Q* = 0.015000)
U.S. POP - 48 STATES - ALL SEASONS	0.000015	2.28E-07
U.S. POPULATION - SPRING SEASON	0.000015	2.23E-07
U.S. POPULATION - SUMMER SEASON	0.000017	2.48E-07
U.S. POPULATION - AUTUMN SEASON	0.000015	2.31E-07
U.S. POPULATION - WINTER SEASON	0.000014	2.08E-07
NORTHEAST REGION	0.000013	2.01E-07
NORTH CENTRAL REGION	0.000018	2.75E-07
SOUTHERN REGION	0.000013	1.93E-07
WESTERN REGION	0.000017	2.57E-07
HISPANICS	0.000008	1.16E-07
NON-HISPANIC WHITES	0.000016	2.44E-07
NON-HISPANIC BLACKS	0.000009	1.34E-07
NON-HISPANIC OTHER THAN BLACK OR WHITE	0.000021	3.16E-07
FEMALES (13+/PREGNANT/NOT NURSING)	0.000008	1.17E-07
FEMALES (13+/NURSING)	0.000008	1.22E-07
MALES (13-19 YEARS)	0.000012	1.83E-07
FEMALES (13-19 YRS/NOT PREG. OR NURSING)	0.000009	1.29E-07
MALES (20+ YEARS)	0.000008	1.27E-07
FEMALES (20+ YEARS/NOT PREG. OR NURSING)	0.000008	1.19E-07

## B. Results of EPA/HED's Calculations

An independent calculation of  $Q_1^*$  values was performed by HED/SSSR. Tumor data were tabulated as combined hepatocellular adenomas and carcinomas, separate  $Q_1^*$  values for adenomas or carcinomas were not calculated.

The analyses to obtain the  $Q_1^*$  values were done using the pooled data for the first and second studies and using the data for the second study only.  $Q_1^*$  values obtained with the first study only appear to be of dubious significance as there was neither a statistically significant or historically significant incidence of tumors for the HDT vs controls in the first study.

Table 5. Mouse liver tumor data<sup>a</sup> (EPA count, including Interim sacrifice)

Dose (ppm)	Combined adenomas/carcinomas
<u>Males</u>	
<u>Pooled First and Second Studies</u>	
0	6/96
20	2/49
60	5/50
180	6/49
500	2/43
1500	27/48***
<u>Second Study Only</u>	
0	3/46
500	2/43
1500	27/48***
<u>Females</u>	
<u>Pooled First and Second Studies</u>	
0	2/87
20	0/46
60	0/47
180	1/46
500	0/40
1500	14/44***
<u>Second Study Only</u>	
0	1/43
500	0/40
1500	14/44***

<sup>a</sup> Data from the first study were obtained at 0, 20, 60, and 180 ppm and for the second study at 0, 500, and 1500 ppm. \*\*\*  $p < 0.001$ , Fisher's Exact Test, by the reviewer.

Based on the data in Table 5 and the TOX-Risk Version 3 (Clement Assoc. Inc) software package, the Agency obtained the values for the  $Q_1^*$  for combined hepatocellular adenomas/carcinomas (linearized multistage model) shown below in



Table 6. The value of  $Q_1^*$  equal to  $3.06 \times 10^{-2}$  (mg/kg BW/day)<sup>-1</sup> (the highest), corresponding to combined adenomas/carcinomas in pooled studies 1 and 2 for males, was used for the risk calculations corresponding to a worst case scenario.

It is noted that the above Agency  $Q_1^*$  calculations for tebuconazole are preliminary pending further Agency assessment of the carcinogenic potential of the subject chemical.

Table 6. EPA values for  $Q_1^*$  for combined hepatocellular adenomas/carcinomas in treated mice.

Source of Data	$Q_1^*$ (mg/kg BW/day) <sup>-1</sup>	Goodness of Fit (p)
<b>Males</b>		
Pooled first & second studies	$3.06 \times 10^{-2}$	0.44
Second study only	$2.19 \times 10^{-2}$	0.10
<b>Females</b>		
Pooled first & second studies	$1.02 \times 10^{-2}$	0.54
Second study only	$1.55 \times 10^{-2}$	0.11

b. EPA's Exposure Assessment and Preliminary Risk Calculations

A dietary exposure analysis has been performed by HED/SACB assuming a feeding restriction as specified in the draft label. The results of this HED/SACB analysis are included as Appendix 1 [EPA memorandum from S. Schaible (HED/SACB) to S. Lewis/J. Fairfax (FHB/RD), dated 5/13/92].

As noted in Appendix 1, for the proposed use on peanuts:

- o The Theoretical Maximum Residue Contribution (TMRC) for the overall U.S. population is 0.000010 mg/kg BW/day, which is approximately 0.1% of the RfD.
- o The subgroup most highly exposed, children aged one through six years old, has a TMRC of 0.000027 mg/kg BW/day, which is approximately 0.27% of the RfD.
- o The exposure assessment represents an overestimate, since it includes tolerance level residues and 100% of crop treated.

Using the Agency dietary exposure estimates (TMRC in Appendix 1) and the preliminary  $Q_1^*$  value of  $3.06 \times 10^{-2}$  (mg/kg BW/day)<sup>-1</sup>, (Table 6), Table 7 depicts the life time risks associated with the various exposures.

As shown in Table 7, the group with the highest dietary exposure, children 1-6 years old, have a preliminary lifetime carcinogenic risk estimate of  $8.26 \times 10^{-7}$  (i.e.  $0.83 \times 10^{-6}$ ), which is approximately 17% below the  $1 \times 10^{-6}$  de minimis risk acceptable to the Agency.

It is noted that the present estimate of risk is an overestimate due to an overestimation of the exposure (for the reasons discussed in Appendix 1) and also as noted in Appendix 1, due to the assuming of an exposure over 70 years while the temporary tolerance and experimental use permit (EUP) for tebuconazole on peanuts would be only one growing season.

The present de minimis risk assessment for temporary tolerance and EUP for tebuconazole on peanuts (PP#9F3724/2H5628) pertains only to the subject action and may be modified pending further Agency assessment of the carcinogenicity potential of tebuconazole.

#### C. Conclusion

It is recommended that the EUP and temporary tolerance on peanuts, with feeding restriction as specified in the draft label, be granted to the Registrant. This petition is granted based on the above calculations which indicate that the resulting exposures pose a de minimis risk from dietary exposure.

#### D. Reference

Miles, Inc. 1992. Dietary Exposure and Risk Assessment for the Use of Tebuconazole on Peanuts. Prepared by C.B. Sandusky, A.C. Katz, S.L. Graham, F.J. Hawk, and J.C. Eickoff (Technical Assessment Systems, Inc., Washington D.C.) for W. Carlson (Miles Inc., Kansas City, MO), dated April 10, 1992.

cc: SACB/HED; Caswell #463.

Table 7. Lifetime risks associated with dietary exposure estimates in Appendix 1<sup>a</sup>.

Population Subgroup	TMRC mg/kg BW/day	Preliminary lifetime carcinogenic risk <sup>b</sup>
U.S. Population - 48 States	0.000010	$3.06 \times 10^{-7}$
U.S. Population - Spring season	0.000010	$3.06 \times 10^{-7}$
U.S. Population - Summer season	0.000010	$3.06 \times 10^{-7}$
U.S. Population - Fall season	0.000009	$2.75 \times 10^{-7}$
U.S. Population - Winter season	0.000009	$2.75 \times 10^{-7}$
Northeast Region	0.000010	$3.06 \times 10^{-7}$
North Central Region	0.000010	$3.06 \times 10^{-7}$
Southern Region	0.000008	$2.45 \times 10^{-7}$
Western Region	0.000011	$3.36 \times 10^{-7}$
Hispanics	0.000006	$1.84 \times 10^{-7}$
Non-hispanic whites	0.000010	$3.06 \times 10^{-7}$
Non-hispanic blacks	0.000006	$1.84 \times 10^{-7}$
Non-hispanic others	0.000008	$2.45 \times 10^{-7}$
Nursing infants (< 1 year old)	0.000002	$0.61 \times 10^{-7}$
Non-nursing infants (< 1 year old)	0.000003	$0.92 \times 10^{-7}$
Females (13+ years, pregnant)	0.000007	$2.14 \times 10^{-7}$
Females (13+ years, nursing)	0.000010	$3.06 \times 10^{-7}$
Children (1-6 years old)	0.000027	$8.26 \times 10^{-7}$
Children (7-12 years old)	0.000020	$6.12 \times 10^{-7}$
Males (13-19 years old)	0.000010	$3.06 \times 10^{-7}$
Females (13-19 years old, not pregnant or nursing)	0.000007	$2.14 \times 10^{-7}$
Males ( $\geq$ 20 years old)	0.000006	$1.83 \times 10^{-7}$
Females ( $\geq$ 20 years old, not pregnant or nursing)	0.000005	$1.53 \times 10^{-7}$

<sup>a</sup> TMRC data from Table 2 of Appendix 1.

<sup>b</sup> Carcinogenic risk calculated by reviewer as follows:

$$\text{Carcinogenic risk} = \text{TMRC} \times Q_1^* ; \text{ where } Q_1^* = 3.06 \times 10^{-2} (\text{mg/kg BW/day})^{-1}$$

Appendix 1



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

MEMORANDUM

MAY 13 1992

OFFICE OF  
PESTICIDES AND TOXIC  
SUBSTANCES

SUBJECT: Dietary Exposure Analysis and De Minimis Risk Assessment for Temporary Tolerance and Experimental Use Permit for Tebuconazole on Peanuts (PP#9F3724/2H5628)

FROM: Stephen A. Schaible *S.A. Schaible*  
Dietary Exposure Section  
SACB/HED (H7509C)

TO: Susan T. Lewis/Julie Fairfax, PM 21 *W. J. Lewis*  
Fungicide-Herbicide Branch  
Registration Division (H7505C)

THROUGH: James P. Kariya, Chief *J. Kariya*  
Dietary Exposure Section  
Health Effects Division

Action Requested

The Dietary Exposure Section (DES) was requested by Registration Division to perform a dietary exposure analysis and carcinogenic risk assessment for the chemical tebuconazole, to see whether the Agency's de minimis value for negligible risk would be exceeded by the carcinogenic risk posed by this Experimental Use Permit (EUP) and temporary tolerance on peanuts. Tebuconazole is a new chemical with no registered uses.

Since it is only recently submitted data that suggest this chemical may be a carcinogen, it has not yet gone to the HED Carcinogenicity Peer Review Committee, nor has its possible upper bound carcinogenic potency factor ( $Q^*$ ) been determined. Without the appropriate  $Q^*$ , a carcinogenic risk analysis cannot be performed by DES. In order to respond to the expedited review request by RD, an alternate analysis was performed instead, in which DES assumed the de minimis value of  $10^{-6}$  for the carcinogenic risk and calculated the  $Q^*$  that would be necessary to arrive at that de minimis value given the exposure value contributed by the EUP on peanuts.

Toxicological Endpoints

The Dietary Risk Evaluation System (DRES) chronic exposure analysis used a Reference Dose (RfD) of 0.01 mg/kg body weight/day, based on a no observed effect level (NOEL) of 1 mg/kg bwt/day and an uncertainty factor of 100. The RfD is based on a one year feeding

study in dogs which demonstrated as effects lenticular and corneal opacity and hepatic toxicity. This RfD has been approved by the HED RfD Peer Review Committee (3/5/91).

Toxicology Branch II recently received 6(a)(2) data concerning an oncogenicity study in mice which showed significant incidences of carcinomas and adenomas at the high dose in males and females (personal communication, A. Protzel, 5/7/92), but at this time tebuconazole is not considered a carcinogen.

### Residue Information

The food use evaluated in this analysis was the temporary tolerance and EUP for tebuconazole on peanuts. The commodities listings in DRES which relate to peanuts are "peanuts-whole" and "peanuts- oil". For the purpose of this temporary tolerance request, tolerances reflecting secondary residues in animal commodities from the use of peanuts as a feed item are not necessary. Since the draft label dated 10/1/91 included a restriction against feeding treated peanut hay/vines to livestock (G. Otakie, 3/18/92), secondary residues are not expected in animal commodities. Tebuconazole is a new chemical and has no registered uses. A summary of the residue information used in this analysis is attached as Table 1.

### Exposure Analysis

The DRES chronic exposure analysis used tolerance level residues and 100% crop treated to estimate the Theoretical Maximum Residue Contribution (TMRC) for the overall U.S. population and 22 population subgroups. A list of the TMRCs and their representations as percentages of the RfD are attached as Table 2.

The TMRC for the overall population from the proposed use on peanuts is 0.000010 mg/kg bwt/day, which represents approximately 0.1% of the RfD. The subgroup most highly exposed, children aged one through six years old, has a TMRC of 0.000027 mg/kg bwt/day, or 0.27% of the RfD. None of the subgroups has a TMRC that exceeds even one percent of the RfD, so it appears that the chronic risk from this EUP is minimal.

### De Minimis Risk Assessment

As was mentioned before, no upper bound potency factor (Q\*) has been determined for tebuconazole. Upper bound carcinogenic risk is calculated using the formula

$$\text{Upper bound carcinogenic risk} = \text{Exposure (TMRC)} \times Q^*$$

If the Q\* is unknown, it is not possible to calculate the upper bound carcinogenic risk. However, by assuming the Agency's de minimis value of  $10^{-6}$  as the upper bound carcinogenic risk value in the equation, we can arrive at a "reference Q\*", the Q\* which would be necessary to contribute a cancer risk of  $10^{-6}$ , given the known

exposure from the EUP on peanuts. In other words, we reshuffled the equation to read as follows

$$\text{Reference } Q^* = \text{Carcinogenic risk } (10^{-6}) / \text{Exposure (TMRC)}$$

The  $Q^*$  arrived at using this analysis is the highest value that could be determined for the upper bound potency factor and still have the cancer risk posed by this EUP not exceed the de minimis value. Using this formula, the "reference  $Q^*$ " for this action is approximately  $0.1 \text{ (mg/kg/day)}^{-1}$ . If the  $Q^*$  that Toxicology Branch and the statisticians in SACB determine is less than this value, the resulting upper bound carcinogenic risk will be less than the de minimis value.

There are several assumptions that possibly make this "reference  $Q^*$ " a more sensitive value than it actually should be. Assumptions made in calculating the exposure value, such as tolerance level residues and 100 percent of crop treated, in all likelihood overestimate the exposure, especially the percent of crop treated assumption, since the acreage that this chemical will be applied to through this EUP probably only represents a small percent of the total acreage that peanuts are grown on. Also, this risk assessment was performed assuming exposure over 70 years while the duration of the temporary tolerance and experimental use permit for tebuconazole on peanuts would be only one growing season. If there were a way to incorporate refinements to these sources of possible overestimation, one would expect that the reference  $Q^*$  would be a higher value, thus allowing the determined  $Q^*$  to be more potent than  $0.1 \text{ (mg/kg/day)}^{-1}$  and still not contribute to an upper bound carcinogenic risk of more than  $10^{-6}$ .

#### Attachments

cc: DES, Tox 1, CBTS, C. Frick, Caswell # 463P

# TABLE 1

CHEMICAL	STUDY TYPE	EFFECTS	REFERENCE DOSES	DATA GAPS/COMMENTS	STATUS
9992ZZ(TEBUCONAZOLE) Caswell #9992ZZ CAS No. A.I. CODE: CFR No. 180.	NOEL= 1.0000 mg/kg 0.00 ppm LEL= 0.0000 mg/kg 0.00 ppm OMCO:		PADI UF -->100 OPP RfD= 0.010000 EPA RfD= 0.0000000	test run for temp tol for tebuconazole on peanuts	

FOOD CODE	FOOD NAME	PETITION NUMBER	TOLERANCE (PPM)		
			NEW	PENDING	PUBLISHED
15006AA	PEANUTS-WHOLE	963817	0.100000		
270070A	PEANUTS-OIL	245628	0.500000		



CHEMICAL INFORMATION	STUDY TYPE	EFFECTS	REFERENCE DOSES	DATA GAPS/COMMENTS	STATUS
999222(TEBUCONAZOLE) Caswell #999222 CAS No. A.I. CODE: CFR No. 180.	NOEL= 1.0000 mg/kg 0.00 ppm LEL= 0.0000 mg/kg 0.00 ppm OMCO:		PADI UF --> 100 OPP RfD= 0.0100000 EPA RfD= 0.0000000	test run for temp tol for tebuconazole on peanuts	

LISTING OF EXPOSURE BY RAC FOR: U.S. POPULATION - 48 STATES

FOOD CODE	FOOD NAME	TOLERANCE (PPM)		EXISTING TOLERANCES		NEW & PENDING TOLERANCES	
		NEW	PENDING	XRFD	XRFD	TMRC (UG/KG/DAY)	XRFD
15006AA	PEANUTS-WHOLE	0.10000				0.006958	0.0695
270070A	PEANUTS-OIL	0.50000				0.002613	0.0261
CROP GROUP TOTALS FOR LEGUME VEGETABLES:						0.009571	0.0957

GRAND TOTAL TMRC: 0.009571 GRAND TOTAL % OF THE RfD: 0.0957

POPULATION SUBGROUP TOTALS

POPULATION TOTAL TMRC 0.009571 POPULATION TOTAL % OF THE RfD 0.0957

$Q_1 \times \text{exposure} = \text{upper bound carcinogenic risk}$

$\text{reference } Q_1 = \frac{\text{upper bound carcinogenic risk}}{\text{exposure (TMRC)}}$

$$= \frac{10^{-6}}{\sim 10^{-5}}$$

$$= 0.1 (\text{mg/kg/day})^{-1}$$

CHEMICAL INFORMATION 9992ZZ (TEBUCONAZOLE) Caswell #9992ZZ CAS No. A.I. CODE: CFR No. 180.	STUDY TYPE NOEL = 1.0000 mg/kg 0.00 ppm LEL = 0.0000 mg/kg 0.00 ppm ONCO:	EFFECTS	REFERENCE DOSES	DATA GAPS/COMMENTS	STATUS
			PADI UF --> 100 OPP RfD = 0.0100000 EPA RfD = 0.0000000	test run for temp tol for tebuconazole on peanuts	

TOTAL TMRC (MG/KG BODY WEIGHT/DAY)

POPULATION SUBGROUP	NEW TMRC**		DIFFERENCE AS PERCENT OF RFD	EFFECT OF ANTICIPATED RESIDUES
	CURRENT TMRC*	NEW TMRC**		
U.S. POPULATION - 48 STATES	0.000000	0.095710	0.095710	
U.S. POPULATION - SPRING SEASON	0.000000	0.098220	0.098220	
U.S. POPULATION - SUMMER SEASON	0.000000	0.103360	0.103360	
U.S. POPULATION - FALL SEASON	0.000000	0.092520	0.092520	
U.S. POPULATION - WINTER SEASON	0.000000	0.088720	0.088720	
NORTHEAST REGION	0.000000	0.101130	0.101130	
NORTH CENTRAL REGION	0.000000	0.100000	0.100000	
SOUTHERN REGION	0.000000	0.078640	0.078640	
WESTERN REGION	0.000000	0.111720	0.111720	
HISPANICS	0.000000	0.057530	0.057530	
NON-HISPANIC WHITES	0.000000	0.104470	0.104470	
NON-HISPANIC BLACKS	0.000000	0.058870	0.058870	
NON-HISPANIC OTHERS	0.000000	0.080160	0.080160	
NURSING INFANTS (< 1 YEAR OLD)	0.000000	0.019130	0.019130	
NON-NURSING INFANTS (< 1 YEAR OLD)	0.000000	0.034070	0.034070	
FEMALES (13+ YEARS, PREGNANT)	0.000000	0.072230	0.072230	
FEMALES 13+ YEARS, NURSING	0.000000	0.101440	0.101440	
CHILDREN (1-6 YEARS OLD)	0.000000	0.268600	0.268600	
CHILDREN (7-12 YEARS OLD)	0.000000	0.200080	0.200080	
MALES (13-19 YEARS OLD)	0.000000	0.102390	0.102390	
FEMALES (13-19 YEARS OLD, NOT PREG. OR NURSING)	0.000000	0.074680	0.074680	
MALES (20 YEARS AND OLDER)	0.000000	0.064050	0.064050	
FEMALES (20 YEARS AND OLDER, NOT PREG. OR NURS)	0.000000	0.049860	0.049860	

\*Current TMRC does not include new or pending tolerances.  
\*\*New TMRC includes new, pending, and published tolerances.