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

JAN 18 1995

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: PP#1F3995 (CBTS #14912; Barcode #D210670). Fenbuconazole on Pecans. Amendment dated 12/21/94. (MRID #'s 434924-00 and 434924-01).

FROM: Nancy Dodd, Chemist *Nancy Dodd*
Tolerance Petition Section II
Chemistry Branch I- Tolerance Support
Health Effects Division (7509C)

THROUGH: Edward Zager, Acting Chief
Chemistry Branch I- Tolerance Support
Health Effects Division (7509C) *EZager*

TO: Cynthia Giles-Parker, PM #22
Herbicide-Fungicide Branch
Registration Division (7505C)

and

Jane Smith, Acting Section Head
Registration Section
Risk Characterization and Assessment Branch
Health Effects Division (7509C)

Rohm and Haas Company has responded to the fenbuconazole review of PP#1F3995 on pecans (N. Dodd, 12/16/94, CBTS #14733, Barcode #D209669). This amendment contains a letter dated 12/21/94 (MRID #434924-00) and a revised analytical method for fenbuconazole and its metabolites RH-9129, RH-9130, and RH-6467 on pecans (MRID #434924-01).

CONCLUSION

A revised analytical method (Rohm and Haas Laboratory Project ID 34-94-175, dated 12/19/94) has been submitted as requested.

RECOMMENDATION

TOX considerations permitting, CBTS recommends for the proposed permanent tolerance of 0.1 ppm for fenbuconazole and its metabolites RH-9129 and RH-9130 on pecans. The revised analytical



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method (Rohm and Haas Laboratory Project ID 34-94-175, dated 12/19/94) will be sent to FDA for publication in the Pesticide Analytical Manual (PAM).

DETAILED CONSIDERATIONS

The deficiency from the review of PP#1F3995 dated 12/16/94 (N. Dodd, CBTS #14733) is repeated below, followed by the petitioner's response and CBTS's conclusion. (The deficiency is numbered as in the 12/16/94 review.)

Deficiency #2

A revised analytical method must be submitted with Equation #2 on page 15 of the revised analytical method TR No. 34-94-161 written as follows:

$$\frac{\text{Final Sample Vol. (ml)} \times \text{Component Conc. (ug/ml)}}{\text{Sample Weight (g)}} = \text{ppm}$$

Petitioner's Response to Deficiency #2

The petitioner has submitted a revised analytical method (Rohm and Haas Laboratory Project ID 34-94-175, dated 12/19/94) with the requested correction to Equation #2 on page 16.

CBTS's Conclusion #2

Deficiency #2 is resolved by submission of the revised analytical method (Rohm and Haas Laboratory Project ID 34-94-175, dated 12/19/94) .

cc: RF, SF, Circu., N. Dodd (CBTS), E. Haeberer (CBTS),
W. Wassell (CBTS), PP#1F3995, PM #22, Jane Smith (RCAB),
MTO File, Donna Davis (CBTS), D. Marlow (ACB/BEAD),
H. Hundley (ACB/BEAD)

RDI:E. Haeberer:1/18/95:R. Loranger:1/18/95
7509C:CM#2:Rm804F:305-5681:N. Dodd:nd:1/18/95