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

NOV 10 1992

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: The Metabolism Committee Meeting Held on November 3, 1992: Plant and Animal Metabolism of SAN-582H.

FROM: Michael T. Flood, Ph.D., Chemist
Tolerance Petition Section II
Chemistry Branch I - Tolerance Support
Health Effects Division (H7509C)

Mike Flood

THROUGH: Debra F. Edwards, Ph.D., Acting Chief
Chemistry Branch I -- Tolerance Support
Health Effects Division (H7509C)

Debra Edwards
11/10/92

TO: The Metabolism Committee
Health Effects Division (H7509C)

A. Individuals in Attendance:

1. Metabolism Committee: (Signatures indicate concurrence unless otherwise stated.)

Karl Baetcke

Reto Engler

Richard Loranger — Richard Loranger

Michael Metzger

Alberto Protzel

2. Scientists: (Non-committee members responsible for data presentation; signatures indicate technical accuracy of panel report.)

Michael Flood _____

Deborah McCall _____

Whang Phang _____

3. Metabolism Committee Members in Absentia: (Committee members who were unable to attend the discussion; signatures indicate concurrence with the overall conclusions of the committee.)

George Ghali _____

Richard Schmitt _____

B. Material Reviewed:

Results of the nature of the residue studies in corn, ruminants and poultry for SAN-582H Herbicide, 2-chloro-N-[(1-methyl-2-methoxy)ethyl]-N-(2,4-dimethylthien-3-yl)-acetamide, were discussed. The Committee concluded that only the parent compound should appear in the tolerance expression for corn grain, forage and fodder. SAN-582H is extensively metabolized in corn and cannot be detected at a detection level of 0.01 ppm. Metabolic pathways of SAN-582H in plants and animals are similar. The principal corn metabolite, the sulfonate conjugate of SAN-582H, has not been found in residue field trials at levels greater than 0.05 ppm (and has not been conclusively identified at lower levels). The soil metabolite oxalamide has also not been detected in corn racs at a level of 0.01 ppm. Attempts to develop a common moiety analytical method have proven unsuccessful. Low levels of residues well below the R_fD of SAN-582 mitigate any toxicological concern. The sulfonate conjugate has low acute toxicity. Setting a tolerance for SAN-582H would provide the basis for regulatory enforcement in the case of gross

misuse.

The herbicide is also extensively metabolized in animals. Because of the low metabolite levels (<0.001 ppm) in meat, milk, poultry and eggs predicted from ruminant and poultry metabolism studies done at exaggerated dosages, and lack of toxicological concern at the resulting very low potential exposure, the Committee concluded that tolerances are not necessary for residues of SAN-582H or its metabolites in animal commodities.

cc: M. Flood, Circu., PP#0F3918, RF, SF, Metabolism Committee File, Signers Above, E. Saito (CCB).

H7509C:CBTS:Reviewer(MTF):CM#2:Rm800A:305-6362:typist(mtf):11/4/92.
RDI:SectionHead:ETHaeberer:BranchSeniorScientist:RALoranger: 11/4/92