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HEALTH EFFECTS DIVISION
SCIENTIFIC DATA REVIEWS
EPA SERIES 361

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MEMORANDUM

DATE: 27-SEP-2001

SUBJECT: PP# 0F06088. ADDENDUM TO "IMAZAMOX IN/ON ALFALFA, CANOLA, LEGUME VEGETABLES, AND WHEAT. HED Risk Assessment, D276570, 13-AUG-2001."
Barcode D278055. PC Code 129171. Case 292469. Submission S573269.

FROM: William H. Donovan, Ph.D., Chemist William H. Donovan
Registration Action Branch 1 (RAB1)
Health Effects Division (HED) (7509C)

THROUGH: G. Jeffrey Herndon, Branch Senior Scientist G. Jeffrey Herndon
RAB1/HED (7509C)

TO: Jim Tompkins, PM Team 25
Registration Division (RD) (7505C)

The Health Effects Division (HED) recently completed a risk assessment document for the use of imazamox on legume vegetables, canola, wheat, and alfalfa (D276570, W. Donovan *et. al.*, 13-AUG-2001). Because the Hazard Identification Assessment Review Committee (HIARC) determined that the toxicological profile of imazamox supports a tolerance exemption for this chemical, all residue chemistry data requirements were removed for this chemical, and no human-health risk assessment was needed. Thus, no tolerance expressions or levels were recommended for imazamox. However, the Registration Division has requested that HED provide the appropriate tolerance expressions and levels supported by the submitted residue chemistry studies. This addendum provides the requested information.

The following information with regards to tolerance expressions and levels was derived from the contractor's review of the residue chemistry database, which was included as an attachment to the HED residue chemistry review (D263875, W. Donovan, 26-JUL-2001). However, HED

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notes that this information is subject to revision in view of several caveats: 1) the residue chemistry database for imazamox has not been through secondary review by HED because of the tolerance exemption recommendation, 2) the proposed tolerance expressions have not been presented to the HED Metabolism Assessment Review Committee (MARC) for approval, and 3) permanent tolerance levels cannot be recommended until the residue analytical method has been successfully validated by the EPA's analytical chemistry laboratory (BEAD/ACB).

Imazamox tolerances are currently listed under 40 CFR § 180.508. Additional tolerances may be considered for residues of the herbicide imazamox, [(±)-2-[4,5-dihydro-4-methyl-4-(1-methylethyl)-5-oxo-1H-imidazol-2-yl]-5-(methoxymethyl)-3-pyridinecarboxylic acid], in or on the following raw agricultural commodities (RACs):

Vegetable, legume, group	0.05 ppm
Canola, seed	0.05 ppm

Tolerances may be considered for the combined residues of the herbicide imazamox and its metabolite AC263284, [(±)-2-[4,5-dihydro-4-methyl-4-(1-methylethyl)-5-oxo-1H-imidazol-2-yl]-5-(hydroxymethyl)-3-pyridinecarboxylic acid], in or on the following RACs:

Wheat, grain	0.30 ppm
Wheat, forage	0.30 ppm
Wheat, hay	0.30 ppm
Wheat, straw	0.20 ppm
Wheat, bran	1.0 ppm
Wheat, shorts	0.80 ppm
Wheat, germ	0.60 ppm

Tolerances may be considered for the combined residues of the herbicide imazamox and its metabolites AC263284 and AC312622, [(±)-2-[4,5-dihydro-4-methyl-4-(1-methylethyl)-5-oxo-1H-imidazol-2-yl]-3,5-pyridinedicarboxylic acid], in or on the following RACs:

Alfalfa, seed	0.10 ppm
Alfalfa, forage	2.0 ppm
Alfalfa, hay	4.0 ppm

cc: W. Donovan, F. Griffith (BEAD/ACB), D. Vogel
RDI: RAB1 Chemists (27-SEP-2001), G. Herndon (27-SEP-2001)
W. Donovan:806R:CM#2:(703)305-7330:7509C:RAB1

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