REPORT TITLE

The 60-Day Response by the Endosulfan Task Force to the Revised Residue Chemistry Chapter Dated January 3, 2001 as Contained in the Health Effects Division Risk Assessment for the Endosulfan Reregistration Eligibility Document Dated January 31, 2001

DATA REQUIREMENT

Not Applicable

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STATEMENT OF NO DATA CONFIDENTIALITY CLAIMS

No claim of confidentiality is made for any information contained in this study on the basis of its falling within the scope of FIFRA §10(d)(1)(A), (B), or (C).

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STATEMENT OF GOOD LABORATORY PRACTICE

No Good Laboratory Practice Statement is required for the information presented in this volume according to 40CFR Part 160.

Submitter and Sponsor: _____

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Date: November 13, 2000

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The 60-Day Response by the Endosulfan Task Force to the Revised Residue Chemistry Chapter Dated January 3, 2001 as Contained in the HED Assessment for the Endosulfan Reregistration Eligibility Document Dated 01/31/2001

I. INTRODUCTION

The Endosulfan Task Force (ETF) consisting of Aventis CropScience USA LP, FMC Corporation and Makhteshim-Agan of North America Inc. prepared this 60-day response to the Revised Residue Chemistry Chapter as contained in the Health Effects Division Risk Assessment for the Endosulfan Reregistration Eligibility Document Dated January 31, 2001 (DP Barcode: D268277; Memo by John S. Punzi, Ph.D., dated January 3, 2001). The ETF appreciates Dr. J. Punzi's thorough review of the endosulfan residue database and preparation of the revised Residue Chemistry Chapter. We have no significant disagreement with the current assessment in terms of data sufficiency to support the existing labeled crops/uses. The ETF 60-day Response is mainly to identify a few text errors and additional crops supported by the existing residue database, and to request Agency review of a few residue reports one of which was not cited in the current Residue Chemistry Chapter (i. e., MRID No. 44617402). Because of the additional reviews, we believe that further revisions are needed in several related sections for the Residue Chemistry Chapter (e.g., GLN 860.1520, GLN 860. 1480, and the Tolerance Reassessment Summary).

II. ENDOSULFAN TASK FORCE RESPONSE TO THE REVISED RESIDUE CHEMISTRY CHAPTER FOR THE ENDOSULFAN REREGISTRATION ELIGIBILITY DECISION (RED) DOCUMENT (DP Barcode: D268277; Memo by John S. Punzi, Ph.D., Dated January 3, 2001)

The comments by the Endosulfan Task Force (ETF) regarding residue chemistry review are given below. These comments specifically address areas of incorporating additional crops on the endosulfan labels that are supported by the existing database and further review of the few submitted studies that were not cited or discussed in the current assessment.

GLN 860.1500 Crop Field Trials

EPA Comments: "The reregistration requirements for magnitude of residue in/on the following RACs have not been fulfilled, and field trial data are required for: barley flour, hay, bran and pearled barley; oat forage, hay, flour, and rolled oats; rye forage, flour, and bran; wheat forage, hay, and aspirated grain fractions. Refer to Table 7 for details of reregistration requirement for the above RACs"

ETF Response: Our records show that data requirements for the processed commodities from the identified small grains have now been fulfilled since the issue date (01/03/01) for the above statements. In a HED/Residue Review Memo dated January 10, 2001 (DP Barcode: D268415; SRRD letter to Aventis dated May 7, 2001, for the "Frozen Storage Stability of Endosulfan in or on Wheat Grain and Selected Processed Commodities"), the Agency concluded that *"The submitted storage stability study is adequate and indicates that the endosulfan residues are*

stable at ≤ -15 C in/on wheat grain and wheat grain processed commodities for at least 12 months. The data support the previously reviewed wheat grain processing study (D253973, S. Devito, 5/27/1999) in which samples were stored at ≤ -10 C for up to ~five months prior to analysis". Additionally, we wish to note that the labeled use of endosulfan on wheat specifically states "Do not apply after heads begin to form". As such, the labeled use for wheat will not trigger the "aspirated-grain fraction" data requirement that is only required for "postharvest, or preharvest use after the reproduction stage begins and seed heads are formed."

Other ETF Comments

1. **Crops Supported by the Existing Residue Data** (Beans, Succulent and Dry, Cucurbit Vegetables, Mustard Seeds, and Raspberries). We noted some minor inconsistency in this section related to a few crops and had sought clarification with EPA/Dr. John Punzi in mid-July 2001. Based on Dr. Punzi's written reply on July 19, 2001, we wish to summarize the status for these crops as follows:

- Beans, Succulent and Dry – The existing endosulfan labels carry the restriction as "Except Lima beans that are for processing." Based on the current Agency guidelines (i.e., bean cannery is no longer listed as a processed bean commodity), the Agency has agreed that this restriction can be removed and it is appropriate to modify future endosulfan labels to read as "Beans, succulent and dry".

- Cucurbit Vegetables (Crop Group 9) – As noted by the Agency review, the ETF has sufficient residue trials conducted with the representative crops to support use on the use on cucurbit vegetables (EPA Crop Group 9). With this response, we hereby request to extend the use to this crop group. The ETF is proposing a crop group tolerance of 1.0 ppm based on the Agency's current reassessed tolerances for cucumber and related melon crops.

- Mustard Seeds – the existing tolerance (0.2 ppm) will be maintained to allow the use on this crop as a member of the Herbs and Spices Group. The Agency has agreed to review the appropriate data (MRID # 00003724) for this use and tested rates and ETF will consider amending the labels accordingly.

- Raspberry and the Caneberry Group (uses and tolerances) – The existing tolerance for raspberries (0.1 ppm) will be maintained. The Agency has agreed to evaluate data from MRID # 00138256 (also # 00003587 and 00003843 which are trials for blueberry) for reassessment and possible caneberry group. The request for the Caneberry Subgroup was by the recent IR-4 program.

2. **Translation of Existing Residue Data** (Crop Group 8 and Additional Root Crops)

- Fruiting Vegetables, Except Cucurbit (Crop Group 8) – In our mid July 2001 inquiry to the Agency, we also asked for clarification for this crop group. Our understanding is that there are sufficient residue data from the tomato and pepper trials to support this crop group. Based upon the information provided, we respectfully request that the Agency reviews the existing pepper data (MRID # 00003864) on file to determine if there is sufficient pepper data (i.e. from the non-bell pepper types) to support a Crop Group 8 tolerance.

- Rutabaga and Radish Root Crops – We noted that the Agency stated in this section that the available data for carrot and potato can be translated to support endosulfan's use/tolerance on turnip root (i.e., when applied in accordance with the existing labeling for the turnip greens). This change is in response to the ETF request made in the 30-day comment to the preliminary HED assessment/residue chapter. Currently, endosulfan is labeled for use on rutabaga and radish in the end-use products marketed in Canada. For harmonization reasons under NAFTA, we request to add these two root crops to the US endosulfan labels. We believe that the uses and tolerances for rutabaga (root only) and radish (root/greens) will be supported by the existing data for the roots (i.e. potatoes and carrots, with residue < 0.05 ppm, the LOQ) and those for the greens/tops (i.e., data from turnip greens, sugarbeet tops, kales and spinach, as referenced by the Agency in Table 7). We will make the proper label amendments to add the use parameters from the data/crop sources, once the Agency approves the appropriate data translation. Currently, endosulfan is used under Section 24c on these two root crops but as for "Grow for Seed Only" and at a higher rate of 2.0 lb ai/acre/application.

- Pistachio Nut Crop – With this, we request the Agency to allow adding the use of this nut crop based on the acceptable residue data for almonds (MRID Nos. 0000 3713 and 00004254). We learned from our meeting with representatives from the IR-4 program that such data translation is appropriate and acceptable.

3. Celery and Leaf Lettuce – Available Crop Field Trials to Support Higher Tolerances and Retaining the Existing Pre-Harvest Intervals

We would like to point out that the Endosulfan Task Force conducted two sets of residue trials for celery and leaf lettuce using two different PHI scenarios and treatment intervals: in 1995 we conducted 13 trials in total (MRID # 44346904 and 44346906) and in 1997 there were 9 trials (MRID # 44701201/02). Both sets of trials have been reviewed and found acceptable to support the respective increased tolerances for these crops resulting from the specified PHIs and application intervals (DB Barcodes: D238677, D238710, D238712, 2/03/98 memo by M. Xue; and DB Barcode: D251525, 05/26/99 memo by S. Devito). In the AgrEvo/ETF response (dated June 3, 1998) to the Agency 2/3/98 review for the first set of 1995 trials, we only informed the Agency that we had started additional trials in 1997 for these crops and would submit the reports for evaluation. Our June 1998 response was mistakenly understood by the Agency as that the ETF had "elected to retain the current tolerance levels" with the associated longer PHI for these crops. The Agency's conclusion is reflected in the Tolerance Reassessment Summary Tables in the previous (01/22/2000) and current Residue Chapters. In our 30-day Response (submitted in May 2000), we intended to have corrected this misunderstanding but neglected to do so.

With this 60-day Response, we now wish to inform the Agency that the Task Force has opted to use the residue data from the1995 trials to support the tolerances and labeling for celery and leaf lettuce. Therefore, we will propose to raise the tolerance for celery to 8 ppm (use at 1 lb a.i./acre, one application and a PHI of 4 days) and the tolerance for the leaf lettuce to 6 ppm (use at 1 lb a.i./acre, two applications with 4 day interval and a PHI of 14 days). This will allow us and the growers to retain the current labeled PHIs for these crops. We respectfully request that the Agency will make the appropriate changes in Table 8 (Tolerance Reassessment Summary) regarding celery and leaf lettuce.

GLN 860.1520 Processed Food/Feed

EPA Comments: The Agency indicated that acceptable processing studies were available for apples, cottonseed, grapes, plums, pineapple, potatoes, and tomatoes but that residue data for the processed commodities from small grains crops are required.

ETF Response: As noted in the previous section, the processing study conducted with wheat grains was rated as acceptable in an Agency review dated January 10, 2001 (DP Barcode: D268415). Therefore, we request that the Agency correct the above and include the wheat processing study for the record.

EPA Comments: Regarding the pineapple processing data (study reference and the cited concentration factors for the pineapple peel and the pineapple wet bran)

ETF Response: We noted with surprise that the Agency selected a 1985 unpublished pineapple processing study for review and citation of concentration factors used in this section for the pineapple peel (7x) and pineapple wet bran (41x). The reference shows that the data source is from 1985 as follows:

> "Accession/MRID # 00157147 – Rohrbach, K., Namba, R., Hylin J., et al. (1985) Analysis of Processed Pineapple Products for Residues of Endosulfan: Project No. G237. Unpublished study prepared by the University of Hawaii, College of Tropical Agriculture and Human Resources, Department of Agricultural Biochemistry (38 pages)".

It is important to the Endosulfan Task Force to point out that there is a 1997 study on file at the Agency that needs to be reviewed since ETF member has not yet received any record of Agency's review for this study. The study was actually generated because of major deficiencies of the older 1985 study. The report was submitted in March 1998 by FMC (member of the ETF) to support the use of endosulfan (Thiodan 3EC; Section 24c) on processed pineapples grown in Hawaii. The study was sponsored by the Pineapple Growers' Association of Hawaii for support of a Section 3 use on processed pineapples. The field trials were conducted using treatment parameters that support such use on processed pineapples. Therefore, we herein provide the study details and request that the Agency reviews this study to determine the proper concentration factors for the currently required processed commodities from pineapple (juice and pineapple processed residue/wet bran):

> "Determine the Magnitude of Residues of Thiodan 3EC in Pineapple Processing Fractions" A Report by M.C. Jackson, Hawaii Agricultural Research Center, September 10, 1997. Sponsored by the Pineapple Growers' Association of Hawaii. Submitted by FMC Corporation on March 1998 (MRID # 44617402). EPA Residue Guideline: 171-4(l)

The study was designed to generate residue data in support of tolerances and registration of Endosulfan in or on pineapple processing fractions under the Section 3 of FIFRA. Two applications of Thiodan 3EC each at 1.5 lb ai/A (1X) for a total of 3.0 lb ai/A were applied to 2 trials of pineapple plants. In addition, applications were made at the exaggerated rate of 4.5 lb ai/A (the 3X rate) for a total application of 9.0 lb ai/A. All trials were located on the island of

Maui, HI. Pineapple RAC samples were collected 60-days after the last application and processed. RAC and processed fractions were analyzed for residues of endosulfan I and II (the alpha- and beta- isomers) and endosulfan sulfate. The data showed maximum combined residue of 1.09 ppm in wet bran at the 1X label rate, giving a maximum concentration factor (CF) of 6 fold during processing of the RAC to the wet bran. This agrees with the typical CF of 3.8 for pineapple RAC to wet bran. The maximum combined residues found at the 3X rate in wet bran was 1.79 ppm, which still does not exceed the 2.0 ppm tolerance currently established for the whole pineapple fruit (RAC). The data also showed the maximum combined residues of 0.07 ppm in beverage juice from any trials at the label 1X rate, thus showing no concentration of endosulfan residues into the pineapple juice commodity (i.e. the equivalent RAC data were 0.11 ppm and 0.17 ppm).

We believe that the results of this 1997 study are in full support of the use on processed pineapples (Section 3). Once the Agency has reviewed this study and finds it acceptable, the ETF will add the appropriate labeling to the product labels for "Use on Processed Pineapples" in accordance with this study. This is in addition to the currently existed labeling for "Pineapple – For Fresh Market Only".

Accordingly, we request that the Agency revise the related sections before finalizing the Residue Chemistry Chapter for endosulfan (e.g., Sections of GLN 860. 1520, GLN 860.1480 and the Tolerance Reassessment Summary).

GLN 860.1480 Meat, Milk, Poultry, Eggs

The ETF agrees with the Agency's finding that the reregistration requirements for animal feeding studies are fulfilled. However, the Task Force does not agree with the calculation of the maximum dietary burden for cattle using pineapple-processed residues (wet bran) as 20% to 30% of the total diet. Use of this commodity in the cattle diet would be very localized since the only US State where pineapples are grown is Hawaii. Therefore, deriving 96% to 97 % of the cattle dietary burden for endosulfan from pineapple processed residues (wet bran) is unreasonable considering the geographic location [i.e., Beef Cattle: 21.6 ppm (wet bran alone)/22.49 ppm (total maximum dietary burden); Dairy Cattle: 14.40 ppm (wet bran)/14.80 ppm (total maximum dietary burden)].

Additionally and as noted in Section 860.1520 above, we also question the reassessed tolerance value cited by the Agency for the processed commodity of wet bran (pineapple processed residues). The Agency proposes a value of 18 ppm for wet bran based on the deficient1985 study. We believe that the results of the new 1997 should be used to support the appropriately labeled use on processed pineapples. Once the study is reviewed and found acceptable, we request that the Agency revises the Table 2 (Calculation of Maximum Ruminant Dietary Burden for Endosulfan) and the related reassessed tolerances for the combined endosulfan residues in the animal commodities.

We also believe that the following changes are supported by the residue data from the above 1997 pineapple processing study (MRID # 44617402):

1. **Table 2** - Calculation of Maximum Ruminant Dietary Burden for Endosulfan

- Pineapple processed residue (wet bran): The reassessed tolerance, if required, should be 3.0 ppm (a reduction from 18 ppm level cited in the current Table 2). The 3.0 ppm value is based on the residues for the pineapple RAC of 0.44 ppm (Agency value of HAFT from studies of MRID # 00003797 to 00003799) and a concentration factor of 6X (value from the1997 study).

- Beef Cattle: The revised contribution of wet bran alone to the total dietary burden calculation should be 3.6 ppm (a reduction from the Agency value of 21.6 ppm). Accordingly, the maximum dietary burden to the beef cattle from endosulfan residues is thus revised as 4.49 ppm (a reduction from the current 22.49 ppm).

- Diary Cattle: The revised contribution of wet bran alone to the total dietary burden calculation should be 2.4 ppm (a reduction from the current 14.4 ppm). Accordingly, the maximum dietary burden to the dairy cattle from endosulfan residues is 2.8 ppm (a reduction from the current 14.8 ppm).

2. Reassessed Tolerances for the Combined Endosulfan Residue in Animal Commodities

We believe that the reassessed tolerances for the animal commodities need to be revised based on the revised calculated maximum ruminant dietary burden for beef cattle to 4.5 ppm (5.0 ppm) and diary cattle to 2.8 ppm (3.0 ppm). These dietary burden values justify the use of the endosulfan parents/sulfate residue levels that were observed at the 12 ppm oral dose (from the referenced cattle feeding study) to estimate the following residues for the animal commodities:

- Fat (cattle, goats, etc.)	7.0 ppm (reflecting 6.7 ppm for the sulfate residues and 0.05 ppm for beta-endosulfan and no quantifiable residues for alpha-endosulfan)
- Meat Byproducts	0.5 ppm (reflecting 0.4 ppm for the sulfate residues and no quantifiable residues for alpha- and beta-endosulfan)
- Liver	4.0 ppm (reflecting 3.1 ppm for the sulfate residues and no quantifiable residues for alpha- and beta-endosulfan)
- Meat	0.5 ppm (reflecting 0.45 ppm for the endosulfan sulfate residues and no quantifiable residues for alpha- and beta-endosulfan)
- Milk	2 ppm (same as EPA value derived from the 12 ppm dose)

In summary, we believe that the data from the 1997 pineapple processing study need to be considered by the Agency to confirm that a lower oral dose from the cattle feeding study can be

used to estimate the reassessed tolerances for the secondary residues derived from the animal commodities.

GLN 860.1850 and GLN 860.1900: Confined/Field Accumulation in Rotational Crops

The ETF agrees with the Agency finding that we have fulfilled the data requirement for the Confined and the Limited Field Rotational Crop studies (OPTS 860.1900, D261610, 6/15/2000, J. Punzi). The Agency stated that *"data indicate that tolerances for residues of endosulfan in rotational crops will not be required provided that the labels are amended to specify a rotational crop restriction of at least thirty (30) days"*. We contacted Dr. John Punzi in mid October 2000, when we first received the review and clarified the specific future plantback labeling for the root crops as well as other crops for which tolerances will not be supported by the ETF. The Agency had confirmed that: (1) the field data with the rotated sugarbeet crop (which showed no detectable residues) will allow no restriction for root crops plantback and (2) that for all other crops without supported tolerances a 30-day plantback labeling will be required. Therefore, we will submit appropriate label amendments in the near future to remove the current restriction statements on the ETF end-use labels that read "Do not plant root crops other than carrots, potatoes, sweet potatoes, and sugarbeets as follow-up crops."

Table 6 – Food/Feed Use Patterns on EP Labels Subjected to Reregistration for Endosulfan

We appreciate the Agency's careful review of all the end-use labels supported by the three Task Force members. We could only identify one rate error under use for walnuts for Agency's confirmation. This is in significant contrast to the rate/application errors that we uncovered as cited/used by HED for the preparation of the *"Second Revision of Occupational and Residential Exposure Assessment And Recommendations for the RED for Endosulfan dated January 2, 2001* (e.g. for pecans, the rate used in the worker exposure assessment was "7.5 lb ai/A", instead of the labeled 0.75 lb ai/100 gallon or 3.0 lb ai/season). In order to be correct and maintain consistency for the final endosulfan RED document, we would appreciate if you could communicate within HED that the correct/labeled application rates as summarized in Table 6 will be used for the revised and final worker occupational exposure assessments.

- Walnut (Table 6) – for the 3EC Formulation [EPA Registration Nos: 279-2924 (FMC) and 45639-169 (AgrEvo/Aventis)]: under the maximum single application rate (ai), the current text reads as "2.5 lb (ai)/A". We believe this is an error, as both labels currently read as 2.0 lb (ai)/A.

- Footnote 1 – it states that *"a restriction against planting of root crops other than carrots, potatoes, sweet potatoes, and sugarbeets as rotational crops is specified on the labels for the following products" EPA registration Nos.: 279-1380, 279-2659, etc"*. We believe it is appropriate to add a notation that this restrictive statement can now be removed , based on the approved field rotational crop study for sugarbeet (i.e., our comments under GLN 860.1900).

Table 7 – Residue Chemistry Science Assessments for Reregistration of Endosulfan

We could identify only two corrections that are related to our request for additional review or confirmation as expressed in the previous sections:

- Under 860.1520 (Processed Food/Feed) - under listing for pineapple: We believe that the references should include the new 1997 study (MRID # 44617402).

- Foot Note 27, which states *"The following are required: A processing study depicting the potential for concentration of residues in barley, oats, and rye processed from grains bearing measurable, weathered residues…….".* We believe that the requirement for the other small grains has been met based on the Agency's review and acceptance of the wheat processing study (Agency memo dated January 10, 2001; DP Barcode D268415).

Tolerance Reassessment Summary

Tolerances Listed under 40 CFR §180.182

As the Agency would agree, the paragraphs in this section will need to be revised, once the Agency approves our requests or comments made in the previous sections and summarized as follows:

- "Pending label revisions for some crops, sufficient field data have been submitted (or were translated when appropriate) to assess the established tolerances for the following plant commodities, **as defined:** almonds, almond hulls, apples, etc……: - We trust the Agency will add the additional crops which have been approved (Aventis July 19, 2001 inquiry) or to be approved upon completion of our 60-day Response (e.g., cucurbit vegetables crop group, mustard seed, pistachio nut, radish, raspberry or/caneberry subgroup, rutabaga, and fruiting vegetables).

- Regarding the paragraphs where the Agency identified the tolerances which need to be revised (as "increased or decreased" values as compared to the current established tolerances for the named crops): The crops or plant commodities for which changes will be needed include: Celery (from 2 ppm to 8 ppm), leaf lettuce (from 2 ppm to 6 ppm), and secondary residues for the animal commodities as commented in the related sections in this Response.

Tolerances to be Proposed Under 40 CFR §180.182

The changes identified for this section include the Agency's proposed value of 20 ppm (or 18 ppm, as cited in Table 8) for the pineapple process residues (wet bran) based on the 1985 study. However, based upon a HAFT of 0.44 ppm and a revised concentration factor of 6X (not 41X) from the 1997 study, ETF believes that the appropriate Agency's proposed tolerance for the wet bran, <u>if</u> required at all, would only be 3.0 ppm. This value for the wet bran is only 1.5X of the current RAC tolerance of 2 ppm for the whole fruit. Therefore, ETF believes that the Agency, upon further review (MRID # 44617402), will conclude that the existing RAC tolerance is sufficient and covers the wet bran residues.

Table 8 - Tolerance Reassessment Summary for Endosulfan

Below are possible errors or ETF's requests for revisions based on review of the Table 8:

- Almonds – the reassessed value, in the Reassessed Tolerance column, should read as 0.2 ppm instead of 0.3 ppm (a possible typo error).

- Celery – The ETF wishes to retain the current labeled PHI (4 days) with the understanding that the proposed tolerance will be raised to 8 ppm based on the 1995 field trials data.

- Cotton gin byproducts – the value listed in Table 8 is 30 ppm. We wish to note that the text for tolerance listed in a separate section was 28 ppm, which might be in error.

- Leaf Lettuce – The ETF wishes to retain the current labeled PHI (14 days) with the understanding that the proposed tolerance will be raised to 6 ppm based on the 1995 field trials data.

- Mustard Seed – the current tolerance of 0.2 ppm will be retained, but under the Spice and Herbs Group, as agreed by the Agency.

- Pineapples – The Agency stated that the current 2.0 ppm tolerance for the RAC can be reduced to 1.0 ppm, based on the existing data (HATF of 0.44 ppm, based on data set from > 0.08 ppm to 0.5 ppm). Because of our response in this 60-day Response for the processed pineapple residues (wet bran), we request that the Agency will reevaluate the decrease of RAC tolerance in conjunction with the available data from the 1997 processing study.

- Pineapple Processed Residue – a value of 18 ppm is currently proposed in Table 8 based on a 1985 study. However, and as stated before, the ETF believes that the existing RAC tolerance of 2.0 ppm is sufficient and covers the residues from processing pineapples based on the results of the new 1997 study.

- New Additions to the Table 8 – We believe that the following additional tolerances are justified pending Agency acceptance of the existing database or by the appropriate crop translations: cucurbit vegetables (1.0 ppm), fruiting vegetables except cucurbit (1.0 ppm), pistachio nuts (0.2 ppm), raspberry (0.1 ppm) and/or caneberry subgroup (0.3 ppm), rutabaga (0.2 ppm), radish root (0.2 ppm) and radish greens/tops (2.0 ppm).

Codex Harmonization

Table 10 – Codex MRLs and Applicable US Tolerances for Endosulfan

In addition to the comments for crops identified in the above section, we could only identify the needed revisions for celery (to 8 ppm) and leaf lettuce (to 6 ppm).

Summary of ETF 60-Day Response Comments

The Endosulfan Task Force appreciates Health Effects Division's thorough review of the extensive endosulfan residue database including the review of the endosulfan end-use labels and use patterns. The comments or errors identified in this response are of relatively minor nature with one exception, the review request for the submitted pineapple processing study (MRID # 44617402). The ETF considers the request to add some of the minor use crops as important for the accuracy and completeness of the document as well as for harmonization purposes. We trust that the Agency will revise the appropriate sections as identified in this response before the RED for endosulfan will be finalized.