



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

DEC 26 1991

OFFICE OF
PESTICIDES AND TOXIC
SUBSTANCES

MEMORANDUM

SUBJECT: Chlorpropham. Request for Opinion Regarding Bridging of Potato Residue Data. CBRS No. 9013; No MRID Number.

FROM: Paula A. Deschamp, Biologist
Reregistration Section I
Chemistry Branch II: Reregistration Support
Health Effects Division (H7509C) *PA Deschamp*

THRU: E. Zager, Branch Chief
Chemistry Branch II: Reregistration Support
Health Effects Division (H7509C) *Debra Edwards, for*

TO: Venus Eagle, PM Team 71
Reregistration Branch
Special Review and Reregistration Division (H7508C)

The Chlorpropham Guidance Document dated 12/87 and the Chlorpropham Reregistration Standard Update dated 10/16/91 required additional residue chemistry data depicting chlorpropham residues of concern (including 3-chloroaniline) in or on potatoes analyzed immediately after treatment in commercial storage with a RTU formulation applied at the maximum registered rate as an aerosol through forced air circulation systems, and (in separate tests) an EC formulation applied at the maximum registered rate as a dilute aqueous spray to potatoes moved along a conveyor belt. Samples from each test are to be taken from several positions in the storage pile.

SRRD has asked CBRS to advise whether or not data from residue tests in which warehouse-stored potatoes were treated with a 4 lb formulation as a fog would support registration of a 7 lb formulation. At the present time, products registered for postharvest use on potatoes include the 49.65% and 78.5% ready-to-use (RTU); 25, 36, and 46.5% emulsifiable concentrate (EC), and 46% soluble concentrate/liquid (SC/L) formulations.

It would be possible to bridge such data to satisfy requirements for residue chemistry provided that the 4 lb and 7 lb formulations are identical types (e.g., both are RTU formulations), have the same application rate and timing, and that the prescribed methods of application are essentially identical.

cc: PA Deschamp (CBRS), RF, SF, Chlorpropham Reg. Std. File, Circ. (7)

H7509C:CBRS:PAD:pad:CM#2:Rm812D:703-305-6227:12/26/91
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