

Sept 10, 80

FILE COPY

Date Out EFB: SEP 10 1980

To: Product Manager Hutton (12)
TS-767

From: Dr. Willa Garner *WJG*
Chief, Review Section No. 1
Environmental Fate Branch

Attached please find the environmental fate review of:

Reg./File No.: 464-448, 464-523

Chemical: Chlorpyrifos

Type Product: Insecticide

Product Name: Lorsban

Company Name: DOW

Submission Purpose:

Z38 Code: 3 (c) (7)

ACTION CODE: 335

Date in: 7/3/80

EFB # 520-521

Date Completed: SEP 10 1980

Deferrals To:

Ecological Effects Branch

Residue Chemistry Branch

Toxicology Branch

Introduction:

The registrant is seeking amended registrations for the insecticides Lorsban 15G (ai chlorpyrifos 15%; Reg. No. 464-523) and Lorsban 4E (ai chlorpyrifos 4 lb/gal.; Reg. No. 464-448) for control of root maggots infesting broccoli, brussel sprouts, cabbage, cauliflower, radishes, and rutabagas.

We do not concur with the issuance of a conditional registration for the above uses.

The following comments are made concerning the above submission:

A. Lorsban 4E

For broccoli, brussels sprouts, cabbage, cauliflower and rutabagas, the application rate is 1.6 to 3.3 fl. oz. per 1000 linear feet of row. The label states: 1) Do not apply more than 4.5 pints (2.25 lb ai) per acre per application. Do not make more than two applications per season. We do not have rotational crop data to support the above application rate.

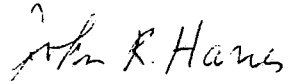
For radishes, the application rate is 1.0 fl. oz. per 1000 linear feet of row. The label states: Do not apply more than 5.5 pints (2.75 lb ai) per acre. The label should be clarified as to whether this maximum application rate is per application, per season or per year.

B. Lorsban 15G

For broccoli, brussels sprouts, cabbage, cauliflower and rutabagas, the application rate is 5.4 to 10.7 ounces per 1000 linear feet of row. The label states: Do not apply more than 15 pounds of Lorsban 15G (2.25 lb ai) per acre. The label should be clarified as to whether this maximum application rate is per application, per season or per year.

For radishes, the application rate is 3.3 ounces of granules per 1000 linear feet of row. The label states: Do not apply more than 18.3 pounds of Lorsban 15G per acre. The label should be clarified as to whether this maximum application rate is per application, per season or per year.

C. An acceptable anaerobic soil metabolism study has not been submitted. Our review of 7/26/78 notes that the registrant planned to start this study in August, 1977. As yet that study, which is required to assess fully the environmental fate of chlorpyrifos, has not been submitted to EFB.



John R. Harris
Environmental Fate Branch
Hazard Evaluation Division