

MEMORANDUM

SUBJECT: **Chlorpyrifos.** DowElanco Letter to D.McNeilly dated 6/22/94. Reregistration Case No. 0100 Chemical No. 059101 No MRID # DP Barcode D205979 CBRS #14106

FROM: Steven A. Knizner, Chemist
Special Review Section I
Chemistry Branch II - Reregistration Support
Health Effects Division (7509C)

THRU: Andrew Rathman, Section Head
Special Review Section I
Chemistry Branch II - Reregistration Support
Health Effects Division (7509C)

TO: Dennis McNeilly, PM Team 73
Accelerated Reregistration Branch
Special Review and Reregistration Division (7508W)

In their letter you dated 6/22/94, DowElanco addressed points raised in recent CBRS memoranda concerning chlorpyrifos.

1) DowElanco noted that in response to CBRS reviews of corn, sunflower, and sorghum field trials (S.Knizner, 8/26/93, CBRS #11372 and S.Knizner, 5/23/94, CBRS #13498), they have submitted revised Section F for Pesticide Petition 4F3008 and Feed/Food Additive Petition 1H5295 to include various crop substrates as recommended by the Agency in the reviews.

CBRS Response: In the reviews noted above, CBRS recommended that reassessment of tolerances be conducted in conjunction with the Chlorpyrifos Reregistration Eligibility Document (RED). The registrant's petition for revision on tolerances PP4F3008/1H5295 are nonetheless currently undergoing review in CBRS in response to a request from RD. A copy of the review will be sent to you. The RED will also reflect the reassessed tolerances.

2) DowElanco provided clarification for residue data previously submitted (MRID #42649001) for onions. These data were generated by IR-4, Central Region, Michigan State University, and were submitted solely in support of SLN MI85006. SLN MI85006 permits a single post plant application of Lorsban 4E (EPA Reg. No. 62719-23) at up to 1 lb ai/A following an at plant application of either Lorsban 4E or Lorsban 15G (at up to 1 lb ai/A).

CBRS Response: The review of MRID #42649001 (S.Knizner, 7/26/93) stated "The tests conducted in MI are adequate to represent the 4 lb/gal EC (EPA SLN No.

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MI850006) use which is registered for direct spray application to the base of seedlings or transplants at 1 lb ai/A". Furthermore, the review went on to state that the submitted data indicate that chlorpyrifos residues resulting from this use on green or bulb onions are not likely to exceed the established tolerance (0.5 ppm) for onions (bulb).

CBRS was not aware that the data in MRID #42649001 were being used solely to support the MI SLN registration. No additional data are required for SLN MI850006.

3) DowElanco stated that there are no geographical restrictions involving uses on onions (dry bulb) on current labeling for either Lorsban 4E or Lorsban 15G.

CBRS Response: CBRS agrees that there are no geographical label restrictions for the use of Lorsban 4E or Lorsban 15G on onions and none are needed.

cc: S.F., circ., R.F., Reg Stnd File, S.Knizner
RDI: A. Rathman, 8/12/94 M.Metzger, 8/12/94 E.Zager, 8/12/94
7509C:CBRS:CM#2:305-6903:SAK:sak:Chlorpyri:8/11/94

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