

9-12-94

MEMORANDUM

SUBJECT: **Chlorpyrifos.** DowElanco Response to Review of Confined Rotational Crop Study. Reregistration Case No. 0100 Chemical No. 059101 No MRID # DP Barcodes D206739 CBRS #14256

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 a letter to you dated 8/12/94, DowElanco responded to an earlier CBRS review of a chlorpyrifos confined rotational crop study (S.Knizner, 6/22/94, CBRS #13710, MRID #43210801). The CBRS review had the following Conclusions/Recommendations:

"When chlorpyrifos was applied to soil at less than the maximal seasonal application rate (4.8 lb ai/A, 0.8X), at the 30 day plant back interval TRR levels in all the rotational crops examined exceeded 0.010 ppm and chlorpyrifos per se was found at up to 0.009 ppm. Therefore, field rotational crop trials (Guideline 165-2) will be required to support a 30 day plant back interval. When conducting field rotational crop trials, an application rate of 6.0 lb ai/A should be used. Samples should be analyzed for residues of chlorpyrifos per se.

If the registrant does not wish to conduct field rotational crop trials to support a 30 day plant back interval, a 132 day plant back interval would be appropriate."

DowElanco responded to this recommendation by proposing to limit the maximum application rate on its chlorpyrifos products to 5 lb ai/A/season on those crops where rotation to another crop could occur. DowElanco noted that the confined rotational crop study would then support a 30 day plant back interval for all rotational crops because all chlorpyrifos residue levels were ≤ 0.01 ppm.

DowElanco noted that their proposal would accomplish two purposes. First, additional field studies, which require an extended time to complete would not be necessary, and second, the maximum amount of chlorpyrifos used in a season will be reduced.

CBRS Response: Provided that DowElanco modifies all labels for its chlorpyrifos containing

products to limit application to 5 lb ai/A/season on those crops where rotation to another crop could occur, CBRS will not require field rotational crop studies. Furthermore, CBRS agrees that a 30 day plant back interval for rotational crops would then be appropriate.

cc: S.F., circ., R.F., Reg Stnd File, S.Knizner
RDI: A. Rathman, 9/12/94 M.Metzger, 9/12/94 E.Zager, 9/12/94
7509C:CBRS:CM#2:305-6903:SAK:sak:Chlrot:9/9/94