PC# 4F3008/FAP#1H5295

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

AUG 15 1994

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: **Chlorpyrifos. PP#4F3008/FAP#1H5295. Revised Section F - Corn, aspirated grain fractions; Sorghum grain, Sorghum forage, Sorghum fodder; Bean hay; Pea hay; Soybean hay; Sunflower seed; Tomatoes, Tomato pomace; Corn Grain milled fractions; and Sunflower hulls.**
Reregistration Case No. 0100 Chemical No. 059101 No MRID # DP Barcodes D206055 and 206053 CBRS #14150 and 14151

FROM: Steven A. Knizner, Chemist
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THRU: Andrew Rathman, Section Head
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TO: Carl Andreasen, PM Team 19
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In a letter dated 6/2/94, DowElanco revises Section F of the subject petitions and requests the inclusion of sunflower and sorghum commodities to the subject petition pending tolerance as follows:

A tolerance for residues of the insecticide chlorpyrifos [O,O-diethyl O-(3,5,6-trichloro-2-pyridyl)phosphorothioate] is proposed for addition to 40 CFR 180.342 as follows:

0.5 ppm in/on corn grain dust
0.5 ppm in/on sorghum grain
0.5 ppm in/on sorghum forage
0.1 ppm in/on bean hay
0.1 ppm in/on pea hay
0.1 ppm in/on soybean hay
0.1 ppm in/on sunflower seed
1.0 ppm in/on tomatoes
2.0 ppm in/on sorghum fodder

Under the provisions of Section 409 of the FFDCA feed additive tolerances for residues of the insecticide chlorpyrifos [O,O-diethyl O-(3,5,6-trichloro-2-pyridyl)phosphorothioate] are proposed for addition to 40 CFR 186.1000 as follows:

0.1 ppm in/on corn grain milled fractions
0.2 ppm in/on sunflower hulls
65 ppm in/on tomato pomace (wet or dry) intended for animal feed when present therein as the result of application of the insecticide to growing tomatoes

Under the provisions of Section 409 of the FFDCA a food additive tolerance for residues of the insecticide chlorpyrifos [O,O-diethyl O-(3,5,6-trichloro-2-pyridyl)phosphorothioate] is proposed for addition to 40 CFR 185.1000 as follows:

0.25 ppm in/on corn grain oil

Recommendations

The tolerance revisions proposed by the registrant for residues of chlorpyrifos per se are appropriate.

TOX considerations permitting, CBRS recommends that 40 CFR 180.342, 185.1000, and 186.1000 be amended to reflect these changes or additions. The tolerance reassessment section of the Reregistration Eligibility Document will also reflect these revised tolerances.

Detailed Considerations

DowElanco has proposed these revised tolerances in response to recent CB memoranda. These memoranda and the recommendations contained therein are summarized below.

Sunflower and Sorghum

A CBRS review of sunflower processing study and sorghum magnitude of the residues study (S.Knizner, 5/23/94, CBRS #13498, MRIDs #43181401 and 43191402) had the following recommendation,

"The sunflower processing study is fully acceptable. In the Tolerance Reassessment Chapter of the Reregistration Eligibility Document (RED), tolerances for residues of chlorpyrifos per se in/on sunflower seed should be set at 0.1 ppm. Residue levels in hulls concentrate approximately 2X versus the rac. Therefore, in the RED, tolerances for residues of chlorpyrifos per se in/on sunflower hulls should be revised to 0.2 ppm.

The sorghum magnitude of the residue study for sorghum grain, forage, and fodder is fully acceptable. In the Tolerance Reassessment Chapter of the RED, tolerances for residues of chlorpyrifos per se should be revised as follows: sorghum grain 0.5 ppm;

sorghum forage 0.5 ppm; and sorghum fodder 2.0 ppm. Although a sorghum processing study, depicting chlorpyrifos residues in sorghum milled fractions was required by the SRR, residue data are no longer required at this time because sorghum flour in the US is used exclusively as a component for drywall, and not as either a human or animal feed item. The Agency reserves the right to require these data if needed at a later date (D.Edwards and E.Zager, "Updated Livestock Feeds Table for Subdivision O (Residue Chemistry) of the Pesticide Assessment Guidelines", dated 4/28/94)."

Tomato, Bean, Pea, and Soybean

A review of PP#4F3008/FAP#1H5295 (L.Cheng, 1/12/93, CBRS #10973) concluded the following,

"The tolerances proposed by the registrant for residues of chlorpyrifos per se in/on tomatoes (1.0 ppm), bean hay (0.1 ppm), pea hay (0.1 ppm), soybean hay (0.1 ppm), and tomato pomace (65 ppm) are appropriate.

TOX considerations permitting, CBRS recommends that 40 CFR 180.342 and 186.1000 be amended to reflect these changes or additions."

Corn

A CBRS review of a corn processing study (S.Knizner, 8/26/93, CBRS #11372, MRID 4264902 had the following recommendation,

"The corn grain processing study is fully adequate, no additional data are required. The data indicate that food/feed additive tolerances for residues of chlorpyrifos per se of 0.1 ppm are required in or on corn grain milled fractions (grits, meal, and flour), based on concentration factors ranging from 1.25x in grits to 2x in flour. A food additive tolerance for residues of chlorpyrifos per se in or on corn oil at 0.25 ppm is required, based on the highest observed concentration factor of 4.5x. A feed additive tolerance for residues of chlorpyrifos per se is required in or on grain dust at 0.5 ppm, based on a concentration factor of approximately 10x in the $<420\ \mu$ dust fraction.

Amendments to 40 CFR 185.1000 and 186.1000 should be made to reflect the above noted tolerances required for residues of chlorpyrifos per se in or on corn processed commodities."

cc: S.F., circ., R.F., Reg Stnd File, S.Knizner, D.McNeilly (SRRD), DRES, PP#4F3008/FAP#1H5295
RDI: A. Rathman, 8/15/94 M.Metzger, 8/15/94 E.Zager, 8/15/94
7509C:CBRS:CM#2:305-6903:SAK:sak:Chlorpyri:8/15/94

3