

2-17-81

FEB 17 1981

Mr. Bob Bischoff
The Dow Chemical Company
P. O. Box 1706
Midland, TX 79640

Dear Mr. Bischoff:

Subject: Pesticide Petition 852270
EPA Registration Nos. 464-448 and 464-523
Chlorpyrifos for use in/on Soybeans
Your Submission of October 14, 1980

We have completed our Residue Chemistry review of the subject petition and find that we cannot act favorably for the following reasons:

1. A minimum time period between applications of Lorsban 4E should be indicated on the label.

The submitted residue data reflects 4 or 5 applications which are spread 17 to 39 days apart except for one two-day spacing shortly after emergence. No data was submitted with short spaced applications at the PHI which would reflect the maximum possible residues under the proposed use.

2. The deletion of tolerances for forage and hay will not eliminate the need for plant metabolism data and we cannot make an animal metabolism conclusion until the plant metabolism question is resolved.
3. Additional residue data on soybeans from the major soybean producing states covering the maximum proposed use, the granular formulation and all regulated residues including significant metabolites found in the plant metabolism studies are still needed. Of the seven residue studies submitted, only five had a PHI close to the 30 days specified on the label. Considering the problem with contaminated controls, this is too small a sampling to adequately judge whether residues would exceed the proposed tolerance.
4. Considering the sensitivity of the methods, 0.01 ppm chlorpyrifos and 0.05 ppm TCP and that only one sample bearing a residue of 0.14 ppm was studied, we cannot adequately judge whether residues in meal will exceed those in soybeans. Therefore, additional data are needed preferably in the form of a processing study where the residues in soybeans are at the tolerance level. Sufficient residues would then be present in soybeans to observe whether residues in fact concentrate in meal.

Also, if additional metabolites are judged in need of regulation as a result of the resolution of the plant metabolism question, processing studies will be needed for these components.

5. We are withholding judgment on the proposed increases in tolerance for meat, fat and meat by-products of goats and sheep until the above deficiencies have been resolved.

We will give this petition further consideration upon receipt of your response to this letter. Because of the importance of this petition, we would like your reply within seventy-five (75) days of receipt of this letter. If you have any questions concerning this letter or if you need additional time in which to respond, please contact me at (703) 557-7824.

Sincerely,

Jay Ellenberger
Product Manager (12)
Insecticide-Rodenticide Branch
Registration Division (70-767)

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