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C. Furlow
(PIB/FOD)

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

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OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Chlorpyrifos (Lorsban™ 4E; EPA Reg. No. 62719-23).
Add third foliar application on walnuts. MRIDs 414244-00 & -01. DEB 6582.

FROM: Kenneth W. Dockter, Chemist *Kenneth W. Dockter*
Special Registration Section I
Dietary Exposure Branch
Health Effects Division (H7509C)

THRU: A.R. Rathman, Section Head *A.R. Rathman*
Special Registration Section I
Dietary Exposure Branch
Health Effects Division (H7509C)

TO: Dennis H. Edwards, Jr., PM 12
Registration Division (H7505C)

DowElanco of Midland, MI has submitted an amended label, "Specimen label 86-1417 date code N1189" for Lorsban™ 4E Insecticide (40.7% ai; Reg. No. 62719-23 [formerly 464-448]) which would allow 3 applications per season on walnuts. This chlorpyrifos product is currently registered with a restriction to 2 applications per season on walnuts. We were instructed to review the proposed increased use, based on the claim [in DowElanco's 3/16/90 cover letter; 414244-00] that, "the original residue data submitted to establish the tolerance for walnuts [PP4F2999] was actually based on 3 foliar applications". The aforesaid, proposed draft label and a 3/15/90 study [414244-01] entitled, "Summary of Previously Submitted Residue Data to Support the Use of Chlorpyrifos on Walnuts" were also provided.

Tolerances have been established for the combined residues of the insecticide chlorpyrifos (O,O-diethyl O-(3,5,6-trichloro-2-pyridyl) phosphorothioate and its metabolite 3,5,6-trichloro-2-pyridinol in or on walnuts at 0.2 ppm (40 CFR § 180.342).

The registered use allows 2 applications of 4 pts product [2 lbs ai]/A per season on walnuts. A 14-day PHI is imposed. Also, livestock grazing in treated orchards is not allowed.

The proposed amended registration would just allow a third foliar application; all other use directions remain unchanged.

The summary of old (PP#3F2778; not 4F2999 as cited above) residue data for walnuts provided includes data generated with other chlorpyrifos formulations. Only the 4E data are considered further. In studies at 4 California sites, maximum residues were <0.025 ppm [non-detectable] in or on walnut samples 12-17 days following the last of 3 foliar applications at 2-2.5 lb ai/A. Therefore, we can conclude that residues which may result from the proposed, increased use will not likely exceed the established tolerance of 0.2 ppm for walnuts.

Conclusion:

Residues which may result from the proposed increased use will not likely exceed the established tolerance of 0.2 ppm for walnuts.

Therefore, we have no objection to the proposed amended registration of LorsbanTM 4E, 62719-23 [old 464-448], to allow 3 foliar applications per season on walnuts.

cc: K. Dockter (DEB), D. Schmitt, Chlorpyrifos Amended use & SF, C. Furlow (PIB/FOD) [H7506C, Room 242]), Circulation (7), RF.

RDI:ARRathman:6/15/90:EZager:6/15/90

H7509C:DEB:CM#2:RM 802:77886:KWDockter:edited by Kd:6/18/90