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

FEB 2 1987

MEMORANDUM

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

SUBJECT: PP #6E3389 (RCB #1803). Chlorpyrifos on Leeks.
Amendment dated 12/15/86. Record #187257.
(No Accession Number)

FROM: Nancy Dodd, Chemist *Nancy Dodd*
Residue Chemistry Branch
Hazard Evaluation Division (TS-769C)

THRU: John H. Onley, Ph.D., Section Head *John H. Onley*
Tolerance Petition Section II
Residue Chemistry Branch
Hazard Evaluation Division (TS-769C)

TO: Hoyt Jamerson, PM #43
Registration Support and Emergency Response Branch
Registration Division (TS-767C)

and

Toxicology Branch
Hazard Evaluation Division (TS-769C)

The petitioner, IR-4, has now submitted an amendment to PP#6E3389. This amendment consisting of a letter dated 12/15/86 and a revised Section B/label dated 12/86 is submitted in response to deficiencies listed in RCB's review of PP#6E3389 dated 12/1/86 (N. Dodd).

The deficiencies listed in the 12/1/86 review are outlined below, followed by the petitioner's responses and RCB's discussions/conclusions.

RCB's Deficiency #4d

The Section B/label should be revised to indicate application in a minimum of 70 gallons of total drench per acre; this is reflective of the residue data submitted. As an alternative, the petitioner may submit additional residue data using a spray volume of 40 gallons (see Residue Data section).

Petitioner's Response to Deficiency #4d

The petitioner submits a revised Section B/label which specifies use of a minimum of 70 gallons of total drench per acre.

RCB's Conclusion #4d

Deficiency #4d is resolved by submission of the revised Section B/label.

RCB's Deficiency #4e

RCB reserves its conclusion concerning the adequacy of the proposed 0.5 ppm chlorpyrifos tolerance on leeks until Deficiency #4d is resolved.

Petitioner's Response to Deficiency #4e

The petitioner has resolved Deficiency #4d by submission of a revised Section B/label.

RCB's Conclusion #4e

Deficiency #4e is resolved by resolution of Deficiency #4d.

RCB concludes that the proposed 0.5 ppm chlorpyrifos tolerance on leeks is adequate to cover residues resulting from the proposed use in NJ.

Other Considerations

An International Residue Limits (IRL) Status sheet was attached to the review of PP #6E3389 dated July 7, 1986 (N. Dodd). There are no Codex, Canadian, or Mexican tolerances for chlorpyrifos on leeks. Therefore, no compatibility questions exist with respect to Codex.

Recommendation

If TB and EAB considerations permit, RCB recommends for the establishment of the tolerance with regional registration for chlorpyrifos at 0.5 ppm (of which no more than 0.2 ppm is chlorpyrifos) on leeks in NJ.

Since the proposed use is restricted to leeks grown in NJ only, any future tolerance for chlorpyrifos on leeks should be included in a separate subsection under 40 CFR 180.342 to avoid confusion regarding future 24(c) registrations and crop-grouping eligibility. The "tolerances with regional registration" would be referenced along with future regional registration tolerances in a new subsection (n) under 40 CFR 180.1 which would define the Agency's interpretation of "tolerances with regional registration." An appropriate interpretation for 40 CFR 180.1, subsection "n", would be:

Certain tolerances are based on geographically limited residue data. These "tolerances with regional registration" are included in separate subsections under 40 CFR 180.101 through 180.999. In order to expand the area of usage on these crops, additional residue data generated in these areas will be required. Persons seeking geographically broader registration on these crops should contact the appropriate EPA product manager concerning whether additional residue data are required.

cc: RF, Circu, Reviewer-N. Dodd, EEB, EAB, TOX, PM#43,
PP#6E3389, FDA, F. Boyd-RCB, PMSD/ISB-Eldredge
RDI:J.H.Onley:1/30/87:R.D.Schmitt:1/30/87
TS-769:RCB:CM#2:RM810:X1681:N.Dodd:N.Dodd:2/2/87