



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

AUG 25 1994

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Chlorpyrifos. PP#4F3008/FAP#1H5295. Revised Section F .
Reregistration Case No. 0100 Chemical No. 059101 No MRID # DP
Barcodes D206049 and 206047 CBRS #14152 and 14153

FROM: Steven A. Knizner, Chemist *St. A. Knizner*
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THRU: Andrew Rathman, Section Head *AR*
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TO: Carl Andreasen, PM Team 19
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In a letter dated 5/26/94, DowElanco revises Section F of the subject petitions. CBRS has previously reviewed a revision to Section F of the subject petitions (S.Knizner, CBRS #14150 and 14151, 8/15/94, attached). That review was in response to a letter from DowElanco dated 6/2/94. The registrant's Section F revision dated 6/2/94 contained all commodities included in their letter dated 5/26/94, and additional commodities.

As noted in the Recommendation section of the 8/15/94 CBRS memo, CBRS concluded that all proposed tolerances in the DowElanco Section F revision dated 6/2/94 were appropriate. However, Branch policy concerning establishment of tolerances for aspirated grain fractions was not properly interpreted. Specifically, the CBRS review dated 8/15/94 erroneously recommended for the establishment of a tolerance for residues of chlorpyrifos per se in/on corn grain dust at 0.5 ppm.

In the memorandum entitled "Aspirated Grain Fractions (Grain Dust): A Tolerance Perspective", (E.Saito and E.Zager, 6/7/94) it is noted that if a pesticide is used on several crops, the rac with the highest residues in the dust will be used to establish the tolerance. Because chlorpyrifos is used on sorghum, soybeans, and wheat in addition to corn, residue data for aspirated grain fractions from these commodities will be required before a tolerance



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for aspirated grain fractions can be established. This guidance document also states that data may not be translated from one crop to another.

Recommendations

With the exception of the recommendation for establishment of a tolerance for residues of chlorpyrifos in/on grain dust at 0.5 ppm, all recommendations in the CBRS memorandum dated 8/15/94 (attached) remain valid and encompass the registrants's request in their letter dated 5/26/94.

Based on Branch policy, the recommendation for establishment of a tolerance for corn aspirated grain fractions (grain dust) was in error. Only after data for aspirated grain fractions of sorghum, soybeans, and wheat are generated can a tolerance for aspirated grain fractions be proposed. This policy will also be reflected in the Chlorpyrifos Reregistration Eligibility Document (RED).

Attachment.

cc: S.F., circ., R.F., Reg Stnd File, S.Knizner, D.McNeilly (SRRD), DRES, PP#4F3008/FAP#1H5295
RDI: A. Rathman, 8/22/94 M.Metzger, 8/25/94
7509C:CBRS:CM#2:305-6903:SAK:sak:Chlorpyri:8/18/94

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