

5-15-81

MAY 15 1981

PP#8E2065. Chlorothalonil on Dry Beans.
Amendment of 1/19/81.

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Residue Chemistry Branch (TS-769)

Minor Uses Officer, Emergency Response
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and

Toxicology Branch
Hazard Evaluation Division (TS-769)

THRU: Charles L. Trichilo, Chief
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

In response to the deficiency stated in our memo of PP#8E2065 (T. McLaughlin, 11/30/78), IR-4 has submitted revised Sections B and F, and a request to utilize hexachlorobenzene (HCB) residue data in PP#6F1799.

A letter dated October 7, 1980 from Diamond Shamrock authorizes the use of their residue data to support this petition. IR-4 also noted that a requested poultry feeding study is in progress and will be completed sometime in 1982.

In the above memo, it was determined that residues of chlorothalonil have been detected on dry beans up to 41 days after application, and that there appears to be a possibility for transfer of residues to meat, milk, poultry and eggs. In addition secondary residues in meat, milk, poultry and eggs, may result from the feeding of other feed items with established chlorothalonil tolerances. Meat and milk feeding studies are available and were reviewed in the above petition. However, no poultry and egg study has been submitted. This deficiency remains outstanding. A poultry feeding study is planned by Diamond Shamrock Co.

To eliminate the need for a poultry feeding study, the petitioner has submitted a revised Section B, increasing the PHI from 14 days to six weeks, and a revised Section F, decreasing the requested tolerance from 0.3 ppm to 0.1 ppm. It has been previously determined (PP#8E2065, 11/30/78) that the residues on treated dry beans occur from the transfer of surface residues on the pods to the beans during the threshing process.

The petitioner was also requested to submit residue data to determine the level of contaminating hexachlorobenzene (HCB) in/on dry beans from this use. It is appropriate to extrapolate the HCB residue data in/on soybeans submitted in PP#6F1799. This data has been previously reviewed by P. Errico (8/13/80). Formulations of Bravo 500 and Bravo W-75 containing a maximum of [REDACTED] gave reported residues of 0.003 ppm to 0.006 ppm, at application rates of 1, 1.8 and 3 lbs a.i./A of chlorothalonil with PHI's ranging from 40 to 57 days.

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Residues of HCB in/on dry beans would be expected to be similar to those reported on soybeans.

We have re-evaluated the residue data in light of the above discussion and revised Sections D and F.

The residue data reflecting 3 applications at a rate of 1.5 lb act/A and observing a 6 week PHI indicate that residues of chlorothalonil and its 4-OH metabolite will be generally non-detectable (<0.05 ppm chlorothalonil and <0.02 ppm metabolite). An occasional residue of <0.1 ppm may be observed in dry beans.

Residues in dry beans from the use described above are much less than those on other feed items with established chlorothalonil tolerances and less than the 0.2 ppm tolerance we have recommended for on soybeans. Consequently, if the petitioner agrees to limit the use to 3 applications of 1.5 lb act/A with a 6 week PHI, we will not raise any further question on the feeding of dry beans at this time.

Recommendation:

TOX considerations permitting and provided the petitioner agrees to limit usage to 3 applications of 1.5 lb act/A with a 6 week PHI, we can recommend for the proposed 0.1 ppm tolerance in/on dry beans.

We defer to TOX on the significance of the HCB level expected in/on dry beans.

TS-769:RCB:PVerico:gs:X77377:CM#2:RM810:5/14/81
cc: RF,Circ.(3), PVerico, Watts, FDA, TOX, EEB, EFB, PP#8E2065
RDI: Quick, 4/16/81: Schmitt, 4/17/81