



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

1-20-84

JAN 20 1984

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM OF CONFERENCE

SUBJECT: Chlorothalonil on almonds, rice, wheat, meat, milk,
poultry and eggs.

FROM: Martin F. Kovacs Jr., PhD., Chemist
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

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

TO: Residue Chemistry Files

Attendees:

Ralph P. Burton	-	SDS Biotech Corp.
Thomas R. Nelson	-	SDS Biotech Corp.
David L. Ballee	-	SDS Biotech Corp.
Jerry R. Lucietta	-	SDS Biotech Corp.
Henry Jacoby	-	RD
Martin Kovacs	-	RCB/HED

This 1/11/84 conference was called by the petitioner to address the deficiencies cited in our M.F. Kovacs Jr. 11/7/83 review of PP# 3F2875 (chlorothalonil in or on almonds, rice, wheat, meat, milk, poultry and eggs).

Mr. Ballee started the meeting by commenting on the length and thoroughness of the subject review and took no issue with either our conclusions or recommendations. However, in light of these conclusions which identified numerous data deficiencies, he further stated that SDS Biotech has decided to withdraw their tolerance proposals for chlorothalonil on rice, wheat, poultry and eggs. SDS Biotech, however, will repropose these tolerances at a later date pending resolution of the cited deficiencies that are pertinent to the proposed use on rice and wheat and the resultant tolerances on poultry and eggs. For the present, SDS Biotech will repropose its tolerance request for chlorothalonil on almonds only via an amended Section F to reflect residues of

chlorothalonil and its 4-OH metabolite on almonds at 0.05 ppm and almond hulls at 0.2 ppm. A revised tolerance for meat and milk will also be proposed commensurate with the repropoed tolerance on almond hulls. Accordingly, the petitioner will attempt to secure a "conditional registration" for use of chlorothalonil on almonds while attempting to satisfy the data gaps we (RCB) identified in the subject review that are pertinent to an almond tolerance.

In conjunction with the repropoed tolerance request for almonds, the petitioner will not submit additional residue studies on almonds but, in response to conclusion 2a of our 11/7/83 review of PP#3F2875, will initially submit a C¹⁴ green leafy vegetable plant metabolism study. At a later date, in response to conclusion 2c of the same review, the petitioner will submit a lactating ruminant (goat) C¹⁴ metabolism study for both chlorothalonil and its 4-OH metabolite. Mr. Nelson stated that the animal metabolism study would be conducted with 3 goats, all at one dosage level, high enough to allow characterization of tissue and milk residues. The conduct of the proposed C¹⁴ plant metabolism study with green leafy vegetables will be commensurate with our request in conclusion 2a that it be conducted to plant maturity to enable RCB to assess the total terminal residue at harvest. Mr. Nelson also stated that a green leafy vegetable metabolism study would be easier to conduct than the wheat metabolism study originally requested by RCB in conclusion 2a and, accordingly, asked Mr. Jacoby and myself if this metabolism study would support the repropoed almond tolerance. We both replied that the proposed metabolism study would be adequate to support the repropoed tolerance on almonds, however, if the wheat and rice tolerance were repropoed then a wheat metabolism study would also be required.

Mr. Burton informed Mr. Jacoby and I as to an upcoming proposal by SDS Biotech to revise CFR 180.275 to allow early season application of chlorothalonil to tart cherries wherein the label would be amended and additional residue data submitted to support use on tart cherries intended for machine harvesting only. According to Mr. Burton, as an integral part of the machine harvesting process, tart cherries are always washed in the field prior to shipment. Therefore, the rac, as it moves in interstate commerce, would reflect this washing process. Mr. Burton stated

that the proposed use is consistent with normal cherry cultural practices and could be supported by the petitioner via statements from both growers and experts at Agricultural Experiment Stations. Mr. Jacoby suggested that Mr. Burton consult with RCB before initiating any work in support of the proposed CFR 180.275 revision. Finally, Mr. Burton took issue with RCB's rejection of the petitioner's imposed label restriction against feeding treated wheat straw. Mr. Jacoby and I reiterated RCB's position on this issue that practical economics dictates that wheat straw could be baled and sold by the grower and in addition, if used for cattle bedding, would be subject to consumption by those cattle.

The conference ended at this time.

TS-769:RCB:M.Kovacs:vrg:CM#2:RM810:X77324:1/18/84
cc: R.F., Circu., Kovacs
RDI: R. Schmitt, 1/16/84; M. Kovacs, 1/13/84