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

MAY 23 1995

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Reregistration of Chlorothalonil. **Registrant's response to requirements for corn forage residue trials, tolerance proposals and label amendments.** List A Case No. 0097; Chemical No. 081901 CBRS No. 15319; DP BARCODE D213495

FROM: William O. Smith, Chemist
Chemistry Pilot Review Team
Chemistry Branch II: Reregistration Support
Health Effects Division (7509C)

THROUGH: Edward Zager, Chief
Chemistry Branch II: Reregistration Support
Health Effects Division (7509C)

TO: Walter Waldrop/Andrew W. Ertman
Reregistration Branch
Special Review and Reregistration Division (7508W)

ISK Biosciences has responded by letter dated 3/22/95 to requirements in a CBRS memorandum (W. Smith, D195757/D195759;Branch Nos. 12653/12651; 12/05/94) for tolerance proposals, label modifications, and additional residue field trials to support registered uses on sweet corn and corn grown for seed. ISK has committed to fulfill the requirements for sweet corn forage and has requested a waiver from the requirements for field corn forage.

SRRD has requested our evaluation of the ISK's rationale for a waiver from the requirement for field corn forage/silage residue field trials. CBRS comments on the waiver request and on ISK's commitments regarding sweet corn uses are provided below.

Background

Chlorothalonil is registered for multiple foliar, postemergence applications to sweet corn and corn grown for seed. Applications may be made as needed at 1.5 lb ai/A at a minimum 4-day retreatment interval to within 14-days of harvest. Applications to sweet corn to be processed are not permitted. Labels also restrict grazing of livestock in treated fields or use of treated corn for silage or livestock forage.

A tolerance of 1 ppm has been established for residues in or on sweet corn (K+CWHR) only.

Conclusions

CBRS recommends that the requirement for a tolerance on field corn forage, supported by field trial data, be waived. We agree with the following proposals from the registrant:

Proposal of a tolerance for combined residues of chlorothalonil and SDS-3701 in or on sweet corn forage, which will be supported by new field trial data.

Proposal of tolerances for combined residues of chlorothalonil and SDS-3701 in or on corn grain at 0.05 ppm and in or on sweet corn and field corn fodder at 50 ppm.

Amendment of all applicable chlorothalonil labels to i) remove existing restrictions against use on sweet corn for processing, ii) remove existing feeding and grazing restrictions and iii) impose a 45 day pregrazing interval on seed corn for feeding treated plant parts as fodder.

Discussion

The following reregistration data requirements were addressed by the registrant in this submission:

Requirements to Support Sweet Corn Use

1. Proposal of a tolerance for the combined residues of chlorothalonil and SDS-3701 in/on sweet corn forage supported by additional field trial data.

   Registrant's response. ISK has committed to propose an appropriate tolerance for sweet corn forage/silage and submit supporting residue data from 1995 field trials conducted in OR, MN or WI and a third location in the northeastern U.S.

   CBRS conclusion. Acceptable data from these field trials will be used to establish tolerances for residues of chlorothalonil and SDS-3701 in/on sweet corn forage.

2. Proposal of a tolerance for residues in/on sweet corn fodder supported by acceptable field trial data (MRID 42944402).

   Registrant's response. ISK will propose a 50 ppm tolerance in/on sweet corn fodder.

   CBRS conclusion. The registrant's response is acceptable.

3. Removal of the restriction on treatment of sweet corn grown for processing and feeding and grazing restrictions on corn forage, silage and fodder from product labels.

Registrant's response. ISK will propose label amendments removing the restriction on treatment of sweet corn grown for processing and feeding and grazing restrictions on corn forage, silage and fodder coincident with the establishment of tolerances for sweet corn forage and sweet corn fodder.

CBRS conclusion. The registrant's response is acceptable.

Requirements to Support Seed Corn Use

1. Proposal of tolerances for residues in/on field corn grain and field corn fodder supported by acceptable field trial data (MRID 42944402).

   Registrant's response. ISK will propose a 0.05 ppm tolerance for field corn grain and a 50 ppm tolerance for field corn fodder.

   CBRS conclusion. The registrant's response is acceptable.

2. Proposal of a tolerance for the combined residues of chlorothalonil and SDS-3701 in/on field corn fodder, which is supported by acceptable field trial data (MRID 42944402), and in/on field corn forage supported by additional field trials.

   Registrant's response. ISK argues that there is no likelihood of seed corn forage being fed to cattle and that a tolerance is not needed for seed corn forage. Applications of chlorothalonil to corn grown for seed begin when the ear is already differentiated within the stalk. Therefore, before the decision is made to apply chlorothalonil, the crop has been fully committed by the hybrid corn seed grower to produce the intended high-value crop of seed corn. ISK proposes label amendments removing the feeding restrictions and imposing a 45-day pregrazing interval for feeding treated plant parts as fodder coincident with the establishment of a tolerance for field corn fodder.

   CBRS conclusions. CBRS agrees with the registrants proposals. Data reflecting residues of chlorothalonil and SDS-3701 in/on field corn forage will not be required if an appropriate tolerance is established on field corn fodder and the label modified to impose a 45-day pregrazing interval. We should note that the pregrazing interval proposed by the registrant is equivalent to a restriction against feeding field corn forage or silage to livestock because the crop will have reached maturity within 45 days of foliar treatment. This restriction is acceptable because of the special conditions noted above that apply in the case of seed corn in which the grower would not be expected to divert the crop to livestock feed.

cc: WSmith (CBRS), Circulate, Chlorothalonil Reg. Std. File, SF, RF.

7509C:CBRS:WOS:CM#2:Rm805A:703-305-5353:05/16/95
RDI: Pilot Team:05/16/95 MMetzger:05/23/95 WZager:05/23/95