



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

C. Farland
PIO/FOO

OCT 23 1990

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM:

SUBJECT: NE-900004; 24(c). Chlorothalonil [BRAVO®-720] for use
on dry beans. EPA Reg No. 50534-188 [DEB:#7086; No
MRID #]

FROM: Dennis McNeilly, Chemist *Dennis McNeilly*
Special Registration Section II
Dietary Exposure Branch
Health Effects Division [H7509C]

THRU: Francis B. Suhre, Section Head *Francis B. Suhre*
Special Registration Section II
Dietary Exposure Branch
Health Effects Division [H7509C]

TO: Susan Lewis/James Stone, PM #21
Herbicide/Fungicide Branch
Registration Division [H7505C]

The Nebraska Department of Agriculture has issued a Section 24(c) registration for the use of chlorothalonil [BRAVO®-720, EPA Reg No. 50534-188] to control Rust, Anthracnose, Downy Mildew, and Cercospora leafspot (blackeye only) in or on dry beans.

A Tolerance has been established for the combined residues of the parent, Chlorothalonil [2,4,5,6-tetrachloro-iso-phthalonitrile] and its metabolite [4-OH-2,5,6-trichloro-iso-phthalonitrile] in or on dry beans at 0.1 ppm [40 CFR 180.275].

A Chlorothalonil Registration Standard and Reg Std FRSTR have been issued. The FRSTR is dated 2/19/88.

The currently registered use for chlorothalonil on dry beans allows for 2 pts. of Bravo®-720 (1.5 lb a.i./A) per application. Begin applications during early bloom stage and repeat at 7 to 10 day intervals. Do not apply within 6 weeks of harvest. Do not graze treated areas or feed treated plant parts to livestock.

The proposed use calls for initial treatment during the early bloom stage using 1 3/8 to 2 pts. of BRAVO®-720 (1.03 to 1.50 lb a.i./A) per application, treatment may be repeated at 7 to 10 day intervals. Use would be restricted to beans harvested dry with the pods removed. Do not apply within 14 days before harvest. Do not allow livestock to graze in treated areas or feed treated plant parts to livestock.

BRAVO-720 contains 54% chlorothalonil (6 lbs a.i./gal or 720gm/L).

This product is produced by the Fermenta ASC Corporation (Mentor, OH).

No residue data were submitted with this Section 24(c). However, data submitted in conjunction with PP#8E2065 indicate that the 0.1 ppm tolerance for chlorothalonil/metabolites in or on dry beans could be exceeded as a result of reducing the PHI from 6 weeks to 14 days. Navy beans receiving 3 applications of 1.5 lb active/acre/application at 6-8 day intervals had initial residues of 0.23 ppm for chlorothalonil and 1.04 ppm for the 4-hydroxy metabolite. Seven days later samples showed residues of 0.09 ppm for chlorothalonil and 1.04 ppm for the 4-hydroxy metabolite. In another study navy beans receiving 3 applications of 1.5 lb a.i./acre/application at 10 day intervals showed residues of 0.18 ppm for chlorothalonil and < 0.01 ppm for the 4-hydroxy metabolite 7 days after treatment.

Note to the PM: After reviewing the residue data submitted in conjunction with PP#8E2065, DEB recommended for the 0.1 ppm tolerance provided the label limited the use to 3 applications of 1.56 lb a.i./acre/application and increase the PHI from the originally proposed 14 days to 6 weeks.

According to the chlorothalonil Reg Std FRSTR, residues of chlorothalonil/metabolites were < 0.04 ppm in or on 3 samples of dry beans harvested 14 days after the last application at 1.04 lbs a.i./A (MRID # 126732). DEB concludes that these limited data do not support decreasing the current PHI from 42 to 14 days.

Conclusions and Recommendations

The 0.1 ppm tolerance for chlorothalonil and its 4-hydroxy metabolite in or on dry beans may be exceeded as a result of unlimited treatments and a PHI of 14 days.

Therefore, we recommend against this 24(c) registration. DEB will reconsider this recommendation upon receipt of adequate residue data to support this proposed use.

Manufacturing Process Information is not Included

Note to the PM: DEB has previously recommended against a proposed 24(c) registration that requested a reduction in the PHI from six weeks to fourteen days when using the chlorothalonil formulation Bravo®-500 on dry beans from the state of North Dakota (ND840002, L. Prost memos of 7/9/84, 8/9/84, 12/18/84). The reason for recommending against that request was that the 0.1 ppm tolerance would not be adequate to cover residues of chlorothalonil and its 4-hydroxy metabolite which may occur on dry beans as a result of unlimited treatments and reducing the PHI from 6 weeks to 14 days.

CC: Sec 24(c);Reviewer;Chlorothalonil[BRAVO®];DRES(J. Kariya);DEB(R. Schmitt);File;Circulation.
RDI: FBS, 10/19/90;EZ,10/22/90.
H7509C: DMM;dmm;CM-2;Rm 800D;X557-0934;10/18/90