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

MAY 26 1994

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Chlorothalonil: ISK Biotech Response to 7/31/91 Reregistration DCI: Guideline 171-4(l), Feed Additive Tolerance on Soybean Hulls: CBRS No 13077: DP Barcode D198330.

FROM: William O. Smith, Ph.D., Chemist
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THROUGH: Paula A. Deschamp, Section Head
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TO: Walter Waldrop/Andrew Ertman - PM 71
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CBRS has been asked to evaluate ISK Biotech's response to the requirement for proposal of a soybean food additive tolerance in the 7/31/91 Chlorothalonil DCI. This requirement was triggered by a soybean processing study, reviewed in the interim Chlorothalonil Residue Chemistry Chapter dated 9/15/83, which showed that chlorothalonil residues of concern concentrate 2x in soybean hulls.

REGISTRANT'S RESPONSE TO 7/31/91 DCI

"ISK Biotech questions the justification for requiring a 0.5 ppm tolerance on soybean hulls. The appropriate time to propose the tolerance is when meat/milk tolerances are proposed. Very little chlorothalonil is applied to soybeans; thus, essentially no residues from chlorothalonil are expected to enter livestock feed from this use. ISK Biotech reserves a decision re tolerances for soybean hulls, pending other data."

CBRS COMMENTS AND CONCLUSIONS

A tolerance has been established for soybeans at 0.2 ppm and available data show that residues in soybean hulls concentrate 2x over the residues in the raw agricultural commodities; therefore, a feed additive tolerance must be proposed for soybean hulls. Regardless of what decisions are made concerning tolerances for meat, milk, poultry and eggs, the only factors that would negate this requirement would be either the revocation of the existing tolerance on soybeans or proof that residues do not concentrate in hulls.

cc: W. Smith, Chlorothalonil Reg. Std. File, SF, RF, circulation.

H7509C:CB-II:WOS:wos:Rm805A:CM#2:X5353:05/23/94
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