



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

AUG 9 1995

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Chlorothalonil: Case No. 0097: Chemical No. 081901: Reconsideration of the Requirement for a Feed Additive Tolerance for Residues of Chlorothalonil in Soybean Hulls: CBRS No. 15975: DP Barcode D218109.

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

William O. Smith

THROUGH: Edward Zager, Chief
Chemistry Branch II-Reregistration Support
Health Effects Division

Edward Zager

TO: Karen Whitby, Acting Chief
Risk Characterization and Analysis Branch (RCAB)
Health Effects Division (7509C)

and

Andrew Ertman
Reregistration Branch
Special Review & Reregistration Division (7508W)

CBRS has previously determined that a Section 409 feed additive tolerance for chlorothalonil residues on soybean hulls was necessary. Based on recent revisions in Agency policy (Federal Register; Vol 60; June 14, 1995; pp. 31300 to 31308), we are withdrawing our recommendation for this tolerance.

Recommendation

We recommend that the registrant be informed that we no longer require the proposal of a section 409 feed additive tolerance for combined residues of chlorothalonil and SDS-3701 on soybean hulls.



Recycled/Recyclable
Printed with Soy/Canola Ink on paper that
contains at least 50% recycled fiber

Discussion

Chlorothalonil is applied to soybeans as two or three applications during the blooming and pod filling stages of development. A tolerance for combined residues of chlorothalonil and its 4-hydroxy metabolite (SDS-3701) has been established for soybeans at 0.2 ppm. Residue data in support of this tolerance (PP#6F1799; MRIDs 00029904, 00029905 and 00087680) were reviewed during reregistration (Chlorothalonil Residue Chemistry Chapter dated 9/15/83); a new processing study (MRID 40183413), required as part of reregistration, was reviewed in the Residue Chemistry Chapter of the Chlorothalonil Draft FRSTR dated 2/19/88. The processing study demonstrated that residues of chlorothalonil and SDS-3701, if present on soybeans, could concentrate up to 2x on the hulls; therefore, a feed additive tolerance was required. This requirement has been repeated in subsequent reregistration reviews including the Residue Chemistry Chapter of the RED dated 6/13/95.

Based on recently issued policy guidance (M. Metzger and E. Zager, "Revised Procedures for Review of Processing Studies and Determination of Need for Section 409 Tolerances", 7/17/95), a Section 409 tolerance would not be required if the residues in hulls, as estimated by multiplying the highest average residue value (HAFT) from soybean field trials by the average concentration factor, do not significantly exceed the RAC tolerance.

The available field trial data demonstrate that residues of chlorothalonil on soybeans are primarily a result of contamination of seeds with trash during harvesting. The HAFT from trials conducted at the maximum label rate is 0.11 ppm. Combining this residue value with the 2x concentration factor for soybean hulls, we can estimate residues of chlorothalonil and SDS-3701 in soybean hulls as:

$$(\text{HAFT}) \times (\text{concentration factor}) = (0.11 \text{ ppm}) \times (2) = 0.22 \text{ ppm}$$

Thus, since the maximum residue in soybean hulls is not expected to significantly exceed the RAC tolerance there is no need for the establishment of a section 409 tolerance.

Please note that we have also withdrawn our recommendation for a feed additive tolerance for residues of chlorothalonil on processed potato waste (W. Smith; D212906 & D215634; 8/03/95). The Residue Chemistry considerations and Tolerance Reassessment portions of the Chlorothalonil RED should be changed accordingly.

cc: W. Smith, Reg. Std. File, SF, RF, M. Clock (HED/RCAB), J. Frane (PSPS), R. Loranger (CBTS), Circ.

7509C:CB-II:WOS:wos:Rm805A:CM2:305-5353:8/08/95

RDI: Pilot Team (8/08/95) RPerfetti (8/09/95) EZager (8/09/95).