

1/18/1995

MEMORANDUM

SUBJECT: PP# 3G04263. New Chemical- Fipronil in/on Corn RACs.  
Answer to Registrants' question regarding data  
translation between formulation types. MRID# none.  
Barcode D206561. CBTS# 14913.

FROM: G.F. Kramer Ph.D., Chemist  
Tolerance Petition Section III  
Chemistry Branch I, Tolerance Support  
Health Effects Division (7509C)

THRU: P.V. Errico, Section Head  
Chemistry Branch I, Tolerance Support  
Health Effects Division (7509C)

TO: Becky Cool, Acting Product Manager  
Daphne Waldo, Team 10 Reviewer  
Registration Division (7505C)

Rhône-Poulenc has submitted an application for tolerances for the insecticide fipronil (5-amino-1-[2,6-dichloro-4-(trifluoromethyl)phenyl]-4-[(1R,S)-(trifluoromethyl)sulfinyl]-1H-pyrazole-3-carbonitrile) and for registration of Fipronil 1.5G, a granular formulation which can be applied broadcast or by soil incorporation (in-furrow). The registrant is also planning to register a WDG (water-dispersible granules) formulation and has requested guidance on what additional data will be required. As these formulations differ significantly, field residue data generated using the WDG formulation will be required. Either 15 trials using the WDG formulation should be conducted, or five side-by-side (bridging) trials comparing the 1.5G and WDG formulations should be conducted. If the latter option is chosen, then the 1.5G formulation should be applied by the technique (broadcast or in-furrow) which resulted in the highest fipronil residue levels. For further guidance, the petitioner should consult p. 17-20 of EPA *Guidance on Number and Location of Domestic Crop Field Trials for Establishment of Pesticide Residue Tolerances*, 6/2/94.

cc: PP#3G04263, Kramer, R.F.  
RDI: P.V. Errico (1/17/95), R.A. Loranger (1/17/95), E. Zager  
(1/18/95)  
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