

US EPA ARCHIVE DOCUMENT

12-18-81



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

DEC 18 1981

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OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

Memorandum

SUBJECT: PP#9F2270. Chlorpyrifos on soybeans.
Amendment of 10/22/81

FROM: K.H. Arne, Ph.D., Chemist *K.H. Arne*
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

THRU: Charles L. Trichilo, Chief
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

TO: Jay Ellenberger, Product Manager No. 12
Insecticide-Rodenticide Branch
Registration Division (TS-767)

In our most recent memo (6/24/81, E. Leovey) we recommended against the proposed tolerances for the following reasons:

1. We have deferred to Toxicology Branch on the need to identify apple metabolites B, C, D and E and the unidentified apple and soybean metabolites, particularly the water soluble metabolites.
2. Provided chlorpyrifos and TCP are concluded to be the only residues of concern, residues in soybeans are not expected to exceed 0.5 ppm. A 0.5 ppm tolerance should be proposed. If Toxicology Branch concludes that other residues are of concern, then additional residue data and a higher tolerance may be needed.

Toxicology Branch has recently (Section 18 for chlorpyrifos Soybeans in Ohio, memo of 8/11/81, A. Mahfouz; PP#s 9F2270 and OF2281, memo of 10/26/81, W. Dkystra) concluded that the above mentioned metabolites are not of concern. The residue of concern continues to be chlorpyrifos and TCP. This question is resolved.

With this amendment the petitioner has submitted a revised Section F in which a tolerance of 0.5 ppm is proposed for soybeans (a tolerance of 1.0 ppm had been originally been proposed). This deficiency is resolved.

A Codex sheet is attached.

Recommendation

Toxicological considerations permitting, we recommend for the proposed tolerances, as follows:

soybeans	0.5 ppm
soybean forage	8 ppm
soybean straw	15 ppm

meat, fat, and meat byproducts of goats	1.0 ppm
meat, fat, and meat byproducts of sheep	1.0 ppm

P.M.: The soybean straw tolerance should be expressed as soybean hay to be consistent with established soybean tolerances. The existing tolerance for other livestock, poultry, eggs and milkfat are adequate to cover secondary residues resulting from this use but may need to be raised to accommodate pending uses on alfalfa (PP#OF2281) and tomatoes (FAP#H5295).

TS-769:RCB:K. Arne:gs:X77484:CM#2:RM810:12/7/81
cc: RF, Circ., Arne, Watts, FDA, TOX, EEB, EFB, PP#9F2270
RDI: Quick, 11/18/81: Schmitt, 11/18/81

INTERNATIONAL RESIDUE LIMIT STATUS

CHEMICAL Chlorpyrifos

PETITION NO. PP#9F2270

CCPR NO. 17

Codex Status

Proposed U.S. Tolerances

No Codex Proposal Step
6 or above

Residue (if Step 9): Chlorpyrifos

Residue: Chlorpyrifos &
3,5,6-trichloropyridinol

<u>Crop(s)</u>	<u>Limit (mg/kg)</u>
Cattle, carcass meat (carcass fat)	2
Sheep, carcass meat (carcass fat)	0.2

<u>Crop(s)</u>	<u>Tol. (ppm)</u>
Soybeans	0.5
Soybean forage	8
Soybean straw	15
meat, fat and meat byproducts of goats sheep	1.0

CANADIAN LIMIT

MEXICAN TOLERANCIA

Residue: Chlorpyrifos and
3,5,6-trichloro-2-pyridinol

Residue: _____

<u>Crop</u>	<u>Limit (ppm)</u>
Meat and meat byproducts of cattle except fat, liver and kidney (fat basis)	1.0
Fat, liver and kidney of cattle	1.0

Crop Tolerancia (ppm)

None on these items

Notes: