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

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OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

Subject: PP#2E2644 Chlorpyrifos on asparagus. Amendment of 9/15/82

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

Thru: Charles L. Trichilo, Chief *R.P. Schmidt*
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

To: Hoyt Jamerson, PM No. 43, ERS
Registration Division (TS-767)

and

Toxicology Branch
Hazard Evaluation Division (TS-769)

In our original review of this petition we recommended against the proposed tolerance on asparagus (2 ppm). For further consideration we required additional data representative of the maximum proposed use.

With this amendment additional residue data (from Indiana) are submitted. Section B has been revised to remove the geographic restriction limiting this use to the Pacific Northwest (the original data was limited to studies from Washington State). Also submitted is a revised Section F in which a tolerance of 4 ppm is proposed for asparagus.

The experiment in Indiana incorporated rates of 1b a.i./A (1x) or 2 lb a.i./A (2x). The PHI was 1, 2, or 3 days (the proposed PHI is 1 day). Residues as a result of the proposed use were 2.5-3.7 ppm at a one day PHI, 0.7-1.2 ppm at 2 days and 1.1-3.4 ppm at 3 days. As a result of the 2x rate residues were 3.9-5.7 ppm at one day, 0.35-4.1 ppm at 2 days and 0.35 ppm at 3 days.

(In these experiments only total TCP was determined. Therefore the reported values may be slightly exaggerated).

Because the proposed use produced residues as high as 3.7 ppm (and none lower than 2.5 ppm) at the proposed 1 day PHI we are not confident that the proposed 4 ppm tolerance would be adequate. A tolerance of 5 ppm would be adequate and should be proposed.

Since California is the major asparagus producing state and is unrepresented in these residue experiments we require a label restriction that limits this use to the Pacific Northwest and the Midwest.

Recommendation

We recommend against the proposed tolerance. For a favorable recommendation we require a revised Section B in which this use is limited by label restriction to the states of the Pacific Northwest and the Midwest and a revised Section F in which a tolerance of 5 ppm is proposed.

TS-769:RCB:KA:vg:CM#2:Rm810:X77377:10/28/82
cc: RF, Circ, Arne, Thompson, FDA, TOX, EEB, EFB, PP#2E2644
RDI: Quick, 10/27/82; Schmitt, 10/27/82