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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: TX 830005. Section 24(c) registration for the use of chlorpyrifos on grain sorghum in Texas

FROM: *for R. Loraner*
Edward Zager, Chemist
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

THRU: Charles L. Trichilo, Chief
Residue Chemistry Branch *R.D. Smith*
Hazard Evaluation Division (TS-769) *for*

TO: Jay Ellenberger, Product Manager #12
Insecticide-Rodenticide Branch
Hazard Evaluation Division (TS-769)

The State of Texas requests a Section 24(c) registration for the use of Lorsban 4E (chlorpyrifos) to control cutworms in grain sorghum.

The proposed use calls for 3 post-emergence aerial or ground applications at the rate of 1-2 pints of Lorsban 4E (0.5-1 lb act) per acre with a maximum of 3 pints of Lorsban 4E (1.5 lb act) per acre per season. The treated crop is not to be used for forage, fodder, hay or silage within 30 days after last treatment. Do not use on sweet varieties of sorghum.

The same use was considered in our review of 12/15/82 (E. Zager). We recommended at the time against the proposed registration due to the following deficiencies:

1. Only one study reflected combined at-plant (Lorsban 15G) and post-emergence applications.

2. In none of the studies was the last post-emergence application made at the maximum proposed rate of 1 lb act/A.

Subsequently, the petitioner revised the Lorsban 4E label restriction to: the treated crop is not to be used for forage, fodder, hay or silage within 30 days after application of 0.5 lb act/A or within 60 days after application at rates above 0.5 lb act/A.

We then concluded (see E. Zager's memo of 6/23/83) that residues of chlorpyrifos and its metabolite 3,5,6-trichloro-2-pyridinol would not exceed the established tolerances of 0.75 ppm on sorghum grain, 1.5 ppm on sorghum forage and 6 ppm on sorghum fodder as a result of the proposed uses of Lorsban 15G Granular Insecticide and Lorsban 4E Insecticide.

We reiterate this conclusion.

Conclusions

1. Residues of chlorpyrifos and its metabolite 3,5,6-trichloro-2-pyridinol may exceed the established tolerances of 0.75 ppm on sorghum grain, 1.5 ppm on sorghum forage and 6 ppm on sorghum forage as a result of the proposed use.

2. The established tolerances would be adequate to cover residues from the proposed use if a restriction against the use of the treated crop for forage, fodder, hay or silage within 30 days of application of 0.5 lb act/A or within 60 days after application at rates above 0.5 lb act/A were imposed on this use.

Recommendation

We recommend against this Section 24(c) registration for reasons listed in Conclusion 1.

However, we would have no objections to this Section 24(c) registration if a restriction against the use of the treated crop for forage, fodder, hay or silage within 30 days of application of 0.5 lb act/A or within 60 days application at rates above 0.5 lb act/A were imposed on this use.

cc: R.F., Chlorpyrifos S.F., Section 24(c) S.F. Circu, Reviewer
RDI:Section Head:RJH>Date:6/17/83
TS-769:RCB:Reviewer:E.Zager:LDT:557-7324:CM#2:RM:810>Date:6/21/83