MEMORANDUM

SUBJECT: 464-EUP-64. Chlorpyrifos on wheat. Revision of EUP program.

FROM: Kenneth W. Dockter, Chemist Residue Chemistry Branch Hazard Evaluation Division (TS-769)

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

TO: Jay S. Ellenberger, Product Manager #12 Insecticide-Rodenticide Branch Registration Division (TS-767)

The Dow Chemical Company is requesting to add the states of AL, CA, CO, MS, MN, MO, NE, NC, OH and PA to EPA Experimental Use Permit No. 464-EUP-64. The temporary tolerances (PP#1G2438/FAP#1H5284) have been extended to 6/7/85. The states already proposed under the subject permit are ID, KS, MN, MT, ND, OK, OR, SD, TX and WA.

This request would involve a total of 1500 lbs active ingredient (LORSBAN 4E) and would treat 1,000 acres of wheat in the states to be added. The original, as revised (Dow letter of February 13, 1984), was for 10,200 acres being treated with 5,999 lbs active ingredient. The reason for requesting the additional chlorpyrifos and acreage is to conduct additional residue studies to support the pending use on wheat under PP#3F2947 and FAP#3H5411.

No additional data are submitted. The pertinent labeling contains the same application rates and restrictions as the revised, original requests.

We conclude that the acreage being requested will be sufficient to adequately address the residue requirements for the pending permanent tolerance request. Five of the states to be added are for the eastern U.S. deficiency noted in our January 20, 1984 review (F. Boyd, PP#3F2947/FAP#3H5411). Except for CA and CO, the remaining are for major wheat growing areas.
Recommendation

Toxicological considerations permitting, we recommend for the proposed amended EUP.

cc: PP#1F2438, R.F., Circu, Reviewer
RDI:Section Head:ARR:Date:6/8/84:RDS:Date:6/8/84