MEMORANDUM

SUBJ: PP43F2884 & 43F2778, Review of Label for Chlorpyrifos (Lorsban 1% Bait) on corn, sugar beets and almonds. [RCB No.435]

FROM: Allan Reiter, Chemist
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Hazard Evaluation Division (TS-769)

THRU: Edward Zager, Section Head
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TO: Jay Ellenberger - RM #12
Pesticide-Rodenticide Branch
Registration Division (TS-767)

Wilbur-Ellis Company (Fresno, Calif.) has requested amended registration for chlorpyrifos on sugar beets, corn and almonds. RCB was asked to review the proposed label to determine whether any additional residue data are needed to support the use on these r.a.c.s. This is a new formulation of chlorpyrifos (O,O-diethyl O-(3,5,6-trichloro-2-pyridyl)phosphorothioate) called Lorsban 1% Bait. The inert ingredients are all cleared under 40CFR§180.1001.

The following tolerances are established for chlorpyrifos: almonds and almond hulls, 0.05 ppm; corn, field, grain & fresh, 0.1 ppm; corn, fodder & forage, 10 ppm; sugar beets, roots, 1 ppm; and, sugar beets, tops, 8 ppm.

The proposed use calls for up to 40 lbs/A (0.4 lb a.i./A) broadcast by ground or air to control cutworms on corn or sugar beets or to control ants on almonds. There is no detailed description of how application is made. There is no restriction on the maximum number of applications or amount of active ingredient per season. Nor is there any restriction on grazing or feeding of forage, fodder, silage or grain. Consequently, we cannot determine whether the established tolerances would be exceeded as a result of the proposed use.

Conclusions and Recommendation

In the absence of adequate description of the proposed use, we are unable to determine whether residues of chlorpyrifos would exceed the established tolerances on sugar beets, corn and almonds. Consequently, we recommend against this registration.
For a further consideration of this request the registrant should submit a detailed use description including the number and timing of applications as well as any pre-harvest and grazing restrictions imposed on the use.

CC: R.F., Circu., A. Reiter, Chlorpyrifos S.F.

RDI: Section Head: E.Z.: 01/31/85: R.D.S. 01/31/85