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

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OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

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SUBJECT: EPA Reg. No. 464-523. Chlorpyrifos on peanuts.

Amended Registration. RCB No. 786.

FROM: Linda S. Propst, Chemist

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THRU: Andrew R. Rathman, Section Head

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TO: Lawrence Schnaubelt, PM # 12

Insecticide-Rodenticide Branch Registration Division (TS-767)

Dow Chemical Company is requesting an amended registration for the chlorpyrifos formulation Lorsban® 15G on peanuts.

Tolerances have been established for combined residues of the pesticide chlorpyrifos (0,0-diethyl 0-(3,5,6-trichloro-2pyridyl) phosphorothioate and its metabolite 3,5,6-trichloro-2-pyridinol in or on peanuts at 0.5 ppm and in or on peanut hulls at 15.0 ppm (40 CFR 180.342).

A food additive tolerance of 1.5 ppm has been established for the same residues in peanut oil (21 CFR 193.85).

The currently registered use for Lorsban® 15G on peanuts allows for one application per year to control cutworms, lesser cornstalk borer, southern corn rootworm larvae, southern blight. If a preventative treatment is used, apply 15 oz. of Lorsban® 15G just prior to or during pegging in a 10-to-18-inch wide band over the fruiting zone. If a rescue treatment for the control of lesser cornstalk borer is used, apply 7.5 to 15 oz Lorsban® 15G in a 10-to-18-inch band over the fruiting zone when the insect first appears usually just prior to or at pegging. not harvest within 21 days after treatment. Do not feed peanut forage or hay to meat or dairy animals.

The proposed amended registration for Lorsban® 15G on peanuts would permit the preventative treatment to be a split treatment and would allow for the rescue treatment to be applied aerially.

The proposed use for Lorsban® 15G on peanuts is as follows:

Preventative treatment

At plant: Apply 7.5 oz. or 15.0 oz. Lorsban® 15G in a 6 to 12 inch band over the row behind the planter shoe and in front of the press wheel. Lightly incorporate with times or chains or other suitable equipment. If the 7.5 oz. rate is used at planting time, then another application of 7.5 oz. per 1000 feet of row should be made postplant to maintain control.

Postplant: Apply 7.5 oz. or 15.0 oz. Lorsban® 15G at early flowering in a 6 to 12 inch band over the row or during early pegging in a 10 to 18 inch band over the fruiting zone. Use the 7.5 oz. rate only if a 7.5 oz. rate was applied at plant.

Rescue Treatment

Band: Use 7.5 to 15 oz. Lorsban® 15G for the control of lesser cornstalk borer when the insect first appears, usually just prior to or at pegging. Apply in a 10 to 18 inch band over the fruiting zone.

Broadcast: When lesser cornstalk borer first appears, uniformly broadcast 10 to 13.6 lb of Lorsban® 15G per acre by aerial application.

Do not apply more than 15 oz. of Lorsban® 15G per 1,000 feet of row or 13.6 pounds of Lorsban® 15G per acre per crop season. Do not harvest within 21 days after treatment. Do not feed peanut forage or hay to meat or dairy animals.

There was no submission of residue data with this request.

There are no data available in our files which reflect the proposed preventative split treatment using Lorsban® 15G solely. However, data submitted in conjunction with PP#9F2193 reflect combined residues of chlorpyrifos on peanuts treated with single or multiple (2-5) soil or foliar applications of chlorpyrifos using Lorsban® 4E, Lorsban® 10G, and Lorsban® 15G for total dosage of 2 to 6 lb active/acre. Maximum combined (chlorpyrifos + TCP) residues collected 14 or more days posttreatment were 0.38 ppm in or on nutmeats and 13 ppm in or on hulls.

No residue data are available in our files reflecting aerial applications of Lorsban® on peanuts.

Conclusions and Recommendations

From the above residue studies using multiple applications and exaggerated rates of Lorsban® on peanuts, we conclude that that the tolerances established for combined residues of chlorpyrifos and its metabolite 3,5,6-trichloro-2-pyridino in or on



peanuts at 0.5 ppm in or on peanuts hulls at 15.0 ppm will not be exceeded as a result of the proposed split preventative treatment or aerial application of the rescue treatment.

Therefore, we recommend for the proposed amended registration.

cc: Reading File, Amended Use File, Subject File, Registration
 Std. File, Reviewer, Circulation, PMSD/ISB
RDI: A. R. Rathman, 5/13/86
TS-769:LSP:lsp:CM#2:Rm810:557-7324:5/13/86