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

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MEMORANDUM

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

SUBJECT: PP#6E3439 (RCB #1804). Chlorpyrifos on Dates.
Amendment dated 12/15/86. Record #187256.
(No Accession Number)

FROM: Nancy Dodd, Chemist *Nancy Dodd*
Residue Chemistry Branch
Hazard Evaluation Division (TS-769C)

THRU: John H. Onley, Ph.D., Section Head *John H. Onley*
Tolerance Petition Section II
Residue Chemistry Branch
Hazard Evaluation Division (TS-769C)

TO: Hoyt Jamerson, PM #43
Registration Support and Emergency Response Branch
Registration Division (TS-767C)

and

Toxicology Branch
Hazard Evaluation Division (TS-769C)

The petitioner, IR-4, has now submitted an amendment to PP#6E3439. This amendment consisting of a letter dated 12/15/86 and a revised Section B/label dated 12/86 is submitted in response to a deficiency listed in RCB's review of PP#6E3439 dated 12/1/86 (N. Dodd).

The deficiency listed in the 12/1/86 review is outlined below, followed by the petitioner's response and RCB's discussion/conclusion.

Deficiency Outlined in the 12/1/86 Review

The label should be revised to restrict use to CA only.

Petitioner's Response to the Deficiency

The petitioner has submitted a revised Section B/label which restricts use to CA only.

RCB's Conclusion

This deficiency is resolved by submission of the revised Section B/label.

Other Considerations

An International Residue Limits (IRL) Status sheet was attached to the review of PP#6E3439 dated 12/1/86 (N. Dodd). There are no Codex, Canadian, or Mexican tolerances for chlorpyrifos on dates. Therefore, no compatibility questions exist with respect to Codex.

Recommendation

If TB and EAB considerations permit, RCB recommends for establishment of the tolerance with regional registration for chlorpyrifos at 0.5 ppm (of which no more than 0.3 ppm is chlorpyrifos) on dates in CA.

Since the proposed use is restricted to dates grown in CA only, any future tolerance for chlorpyrifos on dates should be included in a separate subsection under 40 CFR 180.342 to avoid confusion regarding future 24(c) registrations and crop-grouping eligibility. The "tolerances with regional registration" would be referenced along with future regional registration tolerances in a new subsection (n) under 40 CFR 180.1 which would define the Agency's interpretation of "tolerances with regional registration." An appropriate interpretation for 40 CFR 180.1, subsection "n," would be:

Certain tolerances are based on geographically limited residue data. These "tolerances with regional registration" are included in separate subsections under 40 CFR 180.101 through 180.999. In order to expand the area of usage on these crops, additional residue data generated in these areas will be required. Persons seeking geographically broader registration on these crops should contact the appropriate EPA product manager concerning whether additional residue data are required.

Note to PM: The present Dow label for Polyethylene-D contains the statement "polyethylene containing chlorpyrifos insecticide for the manufacture of banana fruit bags (shrouds)." The statement should be revised to include dates: "polyethylene containing chlorpyrifos insecticide for the manufacture of banana and date fruit bags (shrouds)."

cc: RF, Circu, Reviewer-N. Dodd, EAB, EEB, TOX, F. Boyd-RCB,
PM#43, PP#6E3439, FDA, PMSD/ISB-Eldredge
RDI:J.H.Onley:1/30/87:R.D.Schmitt:1/30/87
TS-769:RCB:CM#2:RM810:X1681:N.Dodd:N.Dodd:2/2/87