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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: PP#7E3466. Chlorpyrifos (Lorsban®) in or on Blueberries. Amendment of 5/29/87 (No. Acc. number, RCB #2454).

FROM: W. T. Chin, Chemist
Tolerance Petition Section III *W. T. Chin*
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

THRU: Philip V. Errico, Section Head *Philip V. Errico*
Tolerance Petition Section III
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

TO: Hoyt L. Jamerson, PM #43
Minor Uses Officer
Registration Division (TS-767)

and

Toxicology Branch
Hazard Evaluation Division (TS-769)

In a previous review in connection with PP#7E3466, RCB recommended against the proposed tolerance of 2.0 ppm for residues of the insecticide chlorpyrifos [0,0-diethyl 0-(3,5,6-trichloro-2-pyridyl) phosphorothioate] and its metabolite 3,5,6-trichloro-2-pyridinol (TCP) in or on the raw agricultural commodity blueberries because of the deficiencies 4a and 4b identified in W. T. Chin's 4/30/87 memo.

In response to these deficiencies, the petitioner, Dr. G. M. Markle (National Coordinator, IR-4), submitted an amendment including a cover letter dated 5/29/87 to H. L. Jamerson (EPA) with a revised Section B. The deficiencies identified above are restated below, followed by the petitioner's response and RCB's comment/conclusion.

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Deficiency 4a

The petitioner is requested to revise Section B indicating the minimum interval in days between applications. The available data support a minimum of 14-day intervals between applications.

The Petitioner's Response to Deficiency 4a

In the revised Section B submitted, the following sentence is included: "Do not apply within 28 days before harvest or apply the treatments closer than 14 days apart."

RCB's Comment/Conclusion on the Petitioner's Response to Deficiency 4a

RCB concludes that deficiency 4a is adequately resolved.

Deficiency 4b

The available field data indicate that at the proposed rate of 1.5 lb a.i./A, 100 to 200 gallons total volume/A/application, or to the point of drip-off were applied. The petitioner is requested to specify the rate in the revised Section B in terms of lb a.i./100 gallons sprayed to run-off.

The Petitioner's Response to Deficiency 4b

The petitioner did not respond to deficiency 4b in the Section B submitted.

RCB's Comment/Conclusion on the Petitioner's Response to Deficiency 4b

RCB concludes that deficiency 4b is still outstanding.

RECOMMENDATION

RCB recommends for the establishment of the proposed tolerance for residues of chlorpyrifos and its metabolite TCP in or on the raw agricultural commodity blueberries at 2.0 ppm if deficiency 4b identified above is adequately resolved through the submission of a revised Section B.

cc: Ciri., R.F., W.T.Chin, PP#7E3466, TOX, RD, PM#43, EAB, EEB and PMSD/ISB
RDI: P.V.Errico(7/15/87): R.D.Schmitt(7/16/87)
TS-769: RCB: CM#2: RM812:557-4352: W.T.Chin,wc(7/16/87)

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