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

C. Furlow
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SEP 18 1991

MEMORANDUM

OFFICE OF
PESTICIDES AND TOXIC
SUBSTANCES

SUBJECT: Chlorpyrifos: Additional Requirements Needed For Data
Call-In. DP Barcode D163718. CBRS No. 7912.

FROM: Felecia A. Fort, Chemist *FA Fort*
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THRU: William J. Hazel, Ph.D., Section Head *W. J. Hazel*
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TO: Lois Rossi/ Joanne Edwards (PM 50)
Reregistration Branch
Special Review/Reregistration Division (H7508W)

CBRS was asked to respond to concerns about the pesticide, chlorpyrifos discussed in several letters written by James A. Singmaster, III, Ph.D., Associate Investigator, Agricultural Experiment Station, University of Puerto Rico. CBRS' opinion is sought on any additional requirements that need to be added to the Chlorpyrifos DCI/Registration Standard.

In his letters, Dr. Singmaster addresses the possible formation of quite toxic impurities in formulations of diazinon and chlorpyrifos resulting from degradation with age. The formulations appear to have excessive cholinesterase inhibitory activity not attributable to the labeled active ingredient. One such formulation apparently resulted in death of cows.

Conclusions

No additional data would appear to be needed. Information concerning possible degradation is addressed in Section 61-3: Formation of Impurities, 62-1: Preliminary Analysis, 63-13: Stability and 63-17: Storage Stability.

Note to PM: Data requirements for end-use products should be addressed by the Registration Support Branch, Registration Division. CBRS recommends that SRRD obtain the input of RD before rendering a final regulatory decision.

cc: Reviewer(F. Fort), C. Furlow(PIB/FOD), Reg. Std. File, RF, SF, Circ.

RDI: WJHazel:9/16/91:EZager:9/16/91

H7509C:CBRS:CM#2:Rm800-E:FAFort/FF:7/18/91