MEMORANDUM

SUBJECT: Chlorothalonil Reregistration; Additional information to be submitted by ISK Biosciences

FROM: Walter I. Waldrop, Section Head
Special Review and Reregistration Division

TO: Evert Byington, Chief
Science Analysis and Coordination Branch (7507C)
Environmental Fate and Effects Division

Debra Edwards, Chief
Risk Characterization and Assessment Branch (7509C)
Health Effects Division

A meeting was held on 4/11/95 between Reregistration Branch (Lois Rossi, Walt Waldrop, and Andrew Ertman) and ISK Biosciences (Jerry Lucietta and Rick Tinsworth) to discuss the upcoming Reregistration Eligibility Decision (RED) for chlorothalonil. ISK believes that there are certain toxicology and ecotoxicity/environmental fate issues that need to be considered in writing the science chapters. ISK has requested the opportunity to present their position in writing for consideration prior to the issuance of the RED. Because chlorothalonil is a large and complex chemical, Reregistration Branch believes that there is value in this approach.

By 5/1/95, ISK will submit a comprehensive package to be evaluated for the RED consisting of issues that they feel need to be addressed. This will include but not necessarily be limited to Estimated Environmental Concentrations (with a summary of modeling that they plan to do) and a request for a review of the cancer classification. By the end of June, 1995, they are planning to have their EEC calculations completed.

Reregistration Branch (RB) is requesting that both EFED and HED take the submitted information into account when writing the science chapters for the RED. RB is aware that this will impact on the current schedule for delivery of the science chapters (HED 6/30/95; EFED 8/1/95) and is willing to adjust the time table as necessary.
A team meeting will be held in early May following receipt of ISK's proposals to discuss any issues or complications that may/will arise from incorporating this information into the RED. Please let RB know in advance if there are any other issues or concerns that need to be addressed at the team meeting.