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

APR 29 1991

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

Memorandum

Subject: PP#OE3889: Chlorothalonil (Daconil®, Bravo®) in or on Blueberries. Amendment of 3/21/91. (no MRID; CBTS #7783)

From: Robert Lascola, Chemist
Chemistry Branch, Tolerance Support
Tolerance Petition Section III
Health Effects Division (H7509C)

Robert Lascola

Thru: P. V. Errico, Section Head
Chemistry Branch, Tolerance Support
Tolerance Petition Section III
Health Effects Division (H7509C)

P. V. Errico

To: Hoyt Jamerson, PM #43
Fungicide/Herbicide Branch
Registration Division (H7505C)

and

Toxicology Branch
Health Effects Division (H7509C)

The petitioner, IR-4, has submitted a cover letter (dated March 21, 1991) and a revised Section B in response to the deficiencies identified in W.T. Chin's memo of February 22, 1991. The original petition requested the establishment of a tolerance for the residues of the fungicide chlorothalonil, 2,4,5,6-tetrachlorophthalonitrile (SDS-2787) and its metabolite, 4-hydroxy-2,5,6-trichlorophthalonitrile (SDS-3701) in or on the raw agricultural commodity blueberry at 1.0 ppm.

In the discussion below, we list each of the deficiencies, the petitioner's response, and our comments.

Conclusions

The revised Section B adequately resolves the deficiencies identified in W.T. Chin's memo of 2/22/91.

RLC 416149-1

Recommendations

TOX considerations permitting, CBTS recommends for the establishment of a tolerance for the residues of chlorothalonil and its metabolite SDS-3701 in or on the raw agricultural commodity blueberry at 1.0 ppm.

Detailed Considerations

Deficiency - Conclusion #2

The petitioner is requested to revise Section B modifying the sentence "Do not apply after full bloom (early petal fall) or within 42 days of harvest" to "Do not apply after full bloom (early petal fall) or within 42 days before harvest."

Petitioner's Response

Petitioner submitted a revised Section B in which the sentence in question now reads, "Do not apply after full bloom (early petal fall) or within 42 days before harvest."

CBTS's Comment/Conclusion

CBTS concludes that the deficiency has been adequately solved.

Deficiency - Conclusion #5b

Since no residue data were submitted from the formulation BRAVO®90DG, the petitioner is requested either to revise Section B deleting this formulation or to submit residue data generated from this formulation.

Petitioner's Response

Petitioner submitted a revised Section B from which the formulation BRAVO®90DG has been removed. The petitioner has also removed the BRAVO®500 formulation from the proposed use.

CBTS's Comment/Conclusion

CBTS concludes that the deficiency has been adequately solved.

Note to PM: Petitioner also removed the formulation BRAVO®500 from Section B. This formulation should no longer be considered for registration of chlorothalonil on blueberries.

cc: Circu., RF, SF, R. Lascola, PP#0E3889, R. D. Schmitt, PIB/FOD.
RDI: P.V. Errico (4/23/91), R. Loranger (4/23/91)
H7509C:CBTS:CM#2, Rm803C, 557-1478, R. Lascola

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