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

MAR 13 1992

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

Memorandum

SUBJECT: PP#2E4050. Chlorothalonil. Amendment dated March 3. Revised Section F. (No MRID#, CBTS #9516, and Barcode #D175270).

FROM: Jerry B. Stokes, Chemist
Chemistry Branch/Tolerance Support
Health Effects Division (H7509C)

THRU: Philip Errico, Section Head
Chemistry Branch/Tolerance Support
Health Effects Division (H7509C)

TO: Cynthia Giles-Parker, PM-22
Fungicide-Herbicide Branch
Registration Division (H7505C)

ISK Biotech has submitted a letter dated March 3, 1992, and a revised Section F to request the exemption from tolerances for chlorothalonil metabolite SDS-3701 (4-hydroxy-2,5,6-trichloroisophthalonitrile) in or on all raw agricultural commodities, except those listed in §180.275 (a), which occur as inadvertent residues resulting from the soil metabolism of chlorothalonil when applied to crops in §180.275 (a), and for SDS-46851 (3-carbamyl-2,4,5-trichlorobenzoic acid) in or on all raw agricultural commodities which occur from the direct application of chlorothalonil to crops in §180.275 (a) and/or as inadvertent residues resulting from the soil metabolism of chlorothalonil when applied to crops in §180.275 (a).

Recommendations

TOX considerations permitting, CBTS can recommend the exemption from tolerances for chlorothalonil metabolite SDS-3701 (4-hydroxy-2,5,6-trichloroisophthalonitrile) in or on all raw agricultural commodities, except those listed in §180.275 (a), which occur as inadvertent residues resulting from the soil metabolism of

chlorothalonil when applied to crops in §180.275 (a), and for SDS-46851 (3-carbamyl-2,4,5-trichlorobenzoic acid) in or on all raw agricultural commodities which occur from the direct application of chlorothalonil to crops in §180.275 (a) and/or as inadvertent residues resulting from the soil metabolism of chlorothalonil when applied to crops in §180.275 (a).

There are no remaining deficiencies in this petition PP#2E4050.

The petitioner has also submitted documentation to support the theory that metabolite SDS-3701 has no detectable pesticidal activity. This information should be given to the Registration Division's efficacy people for review and a decision.

cc: J. Stokes (CBTS); E. Zager (CBRS); C. Furlow (PIB/FOD); Beth Doyle (TOX); Chlorothalonil S.F.; R.F.; Circulation (7)
RDI: PErrico:3/10/92:RLoranger:3/10/92
H7509C:CBTS:JStokes:js:Rm 803A:CM#2:305-6439:3/12/92