US EPA ARCHIVE DOCUMENT
August 4, 1992

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Office of Pesticide Programs (H7508W)
Special Review and Reregistration Division
U.S. Environmental Protection Agency
Room 266A, Crystal Mall No. 2
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Dear Mr. Ertman:

Subject: ROTATIONAL CROP DATA REQUIREMENT
(EPA GUIDELINE NO. 174-A-SS)
CHLOROTHALONIL DATA CALL-IN
(Chemical #081901, Case #0097)
Dated July 31, 1991 & Received August 5, 1991

Reference Petition No. 2E4050 for Exemption from Tolerance
Reference Federal Register, Vol. 57, June 10, 1992, Page 244552

The Chlorothalonil Data Call-In (DCI) requires submission of data to satisfy EPA
Guideline No. 174-A-SS, Rotational Crops. The purpose of this letter is to identify data
previously submitted and actions resulting from the Agency's review of those data. Thus,
this data requirement should be satisfied and no additional data should be required
relative to ISK Biotech's products. However, other registrants should offer to pay
compensation before they can amend their labels.

On September 24, 1991 ISK Biotech submitted a petition for exemption from tolerances
(Petition No. 2E4050) for the following soil metabolites of chlorothalonil:

3-Carbamyl-2,4,5-trichlorobenzoic acid (SDS-46851)

SDS-46851 is a minor degradation product of chlorothalonil formed only in the
soil. It is not a product of plant or animal metabolism of chlorothalonil and is
not a manufacturing impurity. Although only low levels of SDS-46851 have
been found in soil following application of chlorothalonil to crops, it is taken up
by some rotated crops in some environments.

4-Hydroxy-2,5,6-trichloroisophthalonitrile (SDS-3701)

SDS-3701 is the major soil degrade of chlorothalonil and also may be a product
of plant and animal metabolism of chlorothalonil. SDS-3701 is currently
included in tolerance expressions for chlorothalonil. The petition sought to
exempt SDS-3701 in rotated crops from tolerances, since it has been
demonstrated that significant residues of SDS-3701 do not occur in rotated crops.

IMPORTANT NOTE: After review, the petition was amended to exempt only SDS-46851,
as the Agency determined that significant residues of SDS-3701 are not expected to be
present in rotated crops.
Concurrent with the submission of the Petition, applications were also submitted for amended registration for each of the following end-use chlorothalonil products used for agricultural purposes:

<table>
<thead>
<tr>
<th>Name of Product</th>
<th>EPA Reg. No.</th>
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<tbody>
<tr>
<td>BRAVO 500</td>
<td>50534-8</td>
</tr>
<tr>
<td>BRAVO W-75</td>
<td>50534-23</td>
</tr>
<tr>
<td>BRAVO 90DG</td>
<td>50534-157</td>
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<td>BRAVO S</td>
<td>50534-159</td>
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<tr>
<td>BRAVO 720</td>
<td>50534-188</td>
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<tr>
<td>CHLOROTHALONIL 75 WP</td>
<td>50534-189</td>
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</tbody>
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The petition and applications were submitted to Ms. Cynthia Giles-Parker (PM-22), Registration Division. The applications requested deletion of the rotational crop restriction imposed by the 1984 Chlorothalonil Registration Standard, which read as follows:

*Note to User: Do not rotate to crops other than those listed on labels within 12 months of the last treatment. After 12 months from the last application, leafy vegetables (i.e. spinach, lettuce, kale, etc.) may also be rotated.*

Attached is a copy of the Agency’s final rule published June 10, 1992 in the Federal Register, Page 24552. Also a copy of the proposed rule is enclosed (FR. April 15, 1992; Page 13073-4). A copy of EPA’s letter dated June 4, 1992 and accepted labeling for BRAVO 720 (EPA Reg. No. 50534-188) are also enclosed as representative of the Agency’s acceptance of labeling which removes the rotational crop restriction from BRAVO labels.

Studies which should be considered as satisfying rotational crop data requirements include the following MRID Numbers:

<table>
<thead>
<tr>
<th>MRID Numbers</th>
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<tbody>
<tr>
<td>00139550</td>
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<td>41564846</td>
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In addition to the rotational crop studies supporting the petition, appropriate toxicology studies were also submitted.

I trust that the Agency will recognize that the rotational crop data requirements have been fully satisfied through data supporting the above actions and that no additional crop rotation data are required for chlorothalonil.

Sincerely yours,

*Ralph P. Burton*  
Manager Product Registrations

Attachments: 4