

US EPA ARCHIVE DOCUMENT



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

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OCT 13 1992

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

**MEMORANDUM**

**SUBJECT:** Chlorothalonil in/on Imported Snowpeas. Request for DRES Analysis.

**FROM:** Michael Flood, Ph.D., Chemist *E.T. Heber for*  
Tolerance Petition Section II  
Chemistry Branch I -- Tolerance Support  
Health Effects Division (H7509C)

**THROUGH:** Debra F. Edwards, Ph.D., Acting Chief  
Chemistry Branch I -- Tolerance Support  
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*Debra Edwards*  
*10/13/92*

**TO:** James Kariya, Head  
Dietary Exposure Section  
Science Analysis Branch  
Health Effects Division (H7509C)

CBTS requests that a DRES analysis be carried out for chlorothalonil and the impurity hexachlorobenzene (HCB) on the commodity snowpeas. Although the fungicide is not currently registered for use on peas, residues have been found by FDA in/on snowpeas imported from Guatemala. One of the registrants for chlorothalonil is exploring the possibility of conducting residue field trials in Guatemala; however, before carrying out these trials, some assurance should be given that registration of this pesticide on snowpeas is possible and that levels currently found carry minimal risk. For this reason the DRES analysis is requested.

FDA monitoring data for chlorothalonil from 93 samples of snowpeas imported from Guatemala during 1992 show an average residue of 0.036 ppm. If we assume that HCB is present at 0.5% in chlorothalonil -- this assumption was made in Stephen Schaible's 7/24/91 memo for PP#0E3889 -- then the estimated average concentration in snowpeas would be 0.18 ppb. (Detectable chlorothalonil residues were found in 48 samples.) DRES analyses for chlorothalonil and HCB should be carried out using these values. This analysis will give the risk estimate for levels as currently found.

The Biological and Economic Analysis Division (BEAD) (Bob Torla) estimates that imported fresh and frozen snow peas

constitute 5% of the total pea consumption. Domestic production of snowpeas relative to peas is negligible. Therefore, since there are currently no tolerances for chlorothalonil in/on peas, a DRES analysis could be run using the anticipated residues for snow peas under the category "peas" and a "% crop treated" of 5%.

cc: P. Fenner-Crisp, R. Schmitt, M. Van Gemert, Hoyt Jamerson (H7505C), RF, SF, Circu., Mike Flood, E. Haeberer, Debra Edwards