MEMORANDUM

DATE: 24-SEP-1999


FROM: George F. Kramer, Ph.D., Chemist Registration Action Branch 1 Health Effects Division (7509C)

THROUGH: Melba Morrow, D.V.M., Branch Senior Scientist Registration Action Branch 1 Health Effects Division (7509C)

TO: Arnold Layne/Ann Sibold Registration Division (7505C)

American Cyanamid Company has petitioned for permanent tolerances for residues of the insecticide/miticide chlorfenapyr [4-bromo-2-(chlorophenyl)-1-(ethoxymethyl)-5-(trifluoromethyl)-1H-pyrrole-3-carbonitrile] in conjunction with the registration of Chlorfenapyr Insecticide Cattle Ear Tag as follows:

- Milk .................. 0.01 ppm
- Milk Fat ............... 0.02 ppm
- Cattle Meat .......... 0.01 ppm
- Cattle Fat ............ 0.03 ppm
- Cattle Meat Byproducts . 0.05 ppm

Time-limited tolerances (in conjunction with a Section 18 registration on cotton) have been established for: cottonseed (0.5 ppm); Cotton gin byproducts (2.0 ppm); Fat* (0.10 ppm); meat byproducts* (0.3 ppm); Meat* (0.01 ppm); Milk (0.01 ppm); Milk fat (0.15 ppm). [40 CFR §180.513(b); expires 1/31/01]. *of beef, goat, swine, horse and sheep

The current amendment addresses deficiencies identified in HED's previous review (Memo, G. Kramer 8/19/99; D247483).
CONCLUSIONS/RECOMMENDATIONS

HED concludes there are no residue chemistry data requirements that would preclude the establishment of the proposed permanent tolerances for chlorfenapyr in/on milk and cattle RACs. As previous HED risk assessments have included meat and milk tolerances at higher values than those proposed in this action, a new risk assessment will not be required for this petition.

HED notes that meat and milk tolerances which are higher than those proposed in this petition have been established on a time-limited basis under (40 CFR §180.513(b) and proposed in PP#s 6E4683, 6F4623, and 5F4456. If any of these tolerances are established on a permanent basis, then the meat and milk tolerances proposed in this petition will not be necessary.

DETAILED CONSIDERATIONS

Deficiency - Conclusion 7 (from Memo, G. Kramer 8/19/99; D247483)

7. Holstein dairy cows were tagged with chlorfenapyr with 2 ear tags. Samples were analyzed with method M 2405 (LOQ = 0.05 ppm) for liver and kidney; M 2398 (LOQ = 0.01 ppm) for muscle, fat, and milkfat; and M2395.01 (LOQ = 0.01 ppm) for milk. Quantifiable residues were observed only in milkfat (0.018 ppm) and fat (0.020 ppm). Based on the results of this study, the appropriate tolerances are:

Milk ........................................ 0.01 ppm
Milk Fat .................................... 0.02 ppm
Cattle Meat.................................. 0.01 ppm
Cattle Fat .................................. 0.03 ppm
Cattle Meat Byproducts ...................... 0.05 ppm

A revised Section F is thus required for this petition.

Petitioner's Response: Submission of a revised Section F.

HED's Conclusion: The requested information has been provided. This deficiency is now resolved.

cc: PP#8FG4980, G. Kramer (RAB1)
RDI: M. Morrow (9/24/99), Team (9/23/99)
G.F. Kramer:806T:CM#2:(703)305-5079;7509C:RAB1
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DETAILED CONSIDERATIONS

Deficiency - Conclusion 7 (from Memo, G. Kramer 8/19/99; D247483)

7. Holstein dairy cows were tagged with chlorfenapyr with 2 ear tags. Samples were analyzed with method M 2405 (LOQ = 0.05 ppm) for liver and kidney; M 2398 (LOQ = 0.01 ppm) for muscle, fat, and milkfat; and M395.01 (LOQ = 0.01 ppm) for milk. Quantifiable residues were observed only in milkfat (0.018 ppm) and fat (0.020 ppm). Based on the results of this study, the appropriate tolerances are:

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Cattle Meat ............... 0.01 ppm
Cattle Fat ................ 0.03 ppm
Cattle Meat Byproducts .... 0.05 ppm

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