

467



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

12/30/81

OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

Memorandum

SUBJECT: PP#9E2145. Gibberellins on all r.a.c.'s. 12/2/80 amendment and comments on TOX review of 8/24/81.

FROM: *R.B. Perfetti*  
R.B. Perfetti, Chemist  
Residue Chemistry Branch  
Hazard Evaluation Division (TS-769)

TO: H. Jamerson, Acting Minor Crops Officer  
Registration Division (TS-767)  
and  
Toxicology Branch ✓  
Hazard Evaluation Division (TS-769)

THRU: Charles L. Trichilo, Chief  
Residue Chemistry Branch  
Hazard Evaluation Division (TS-769)

This amendment is in response to TOX memos of 8/11 and 8/24/81. RCB is asked to reconsider our earlier conclusion expressed in our memo of 5/28/81 in light of these TOX memos.

We have reconsidered our memo cited above in light of TOX conclusions and we find no incongruities between the two positions other than that TOX has addressed the question solely with respect to exemptions from the requirements of a tolerance for gibberellins rather than discussing the need for tolerances. We expect that the question was addressed in this way because an exemption was proposed in the first place.

We do not disagree that for those naturally occurring gibberellins which are applied at <20 gms/acre an exemption would be appropriate, but for other situations (i.e., >20 gms applied/acre, synthetic gibberellins, etc.) the tolerance vs exemption question should be handled on a case by case basis.

There will certainly be occasions when a tolerance is much more appropriate than an exemption and TOX and RCB will work together, as we have done in the past, to determine what action is needed to protect the public health.

We therefore reiterate our conclusions discussed in our memos of 12/6/79 and 5/28/81. The petitioner should be informed of the requirements for resolution of these deficiencies. These are also discussed in the appropriate conclusions.

*glt*

TS-769:RCB:R.Perfetti:gs:X77324:CM#2:RM810:12/30/81

cc: RF, Circ., Perfetti, Watts, Gibberellins SF, FDA, TOX, EEB, EFB, PP#1E2554

RDI: Quick, 12/10/81: Schmitt, 12/10/81

85  
2