

0503



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

MAR 24 1986

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: PP#5F3267 (No Acc. number; RCB #380): Fosetyl-Al (Aliette®) in or on Citrus. Amendment of 11/12/85.

FROM: W. T. Chin, Chemist *W. T. Chin*
Petition Evaluation Section III
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

THRU: Philip V. Errico, Section Head *Philip V. Errico*
Petition Evaluation Section III
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

TO: Henry M. Jacoby, PM #21
Herbicide-Fungicide Branch
Registration Division (TS-767)

and
Toxicology Branch
Hazard Evaluation Division (TS-769)

BACKGROUND

The Rhone-Poulenc, Inc., has proposed a tolerance for the fungicide fosetyl-Al [Aliette®, Aluminum tris (O-ethylphosphonate)] in/on citrus at 0.1 ppm (PP#5F3267, Acc. #073642, 6/26/85; Sami Malak, 9/27/85).

RCB has recommended against this proposal because of the two deficiencies identified in the Conclusions Nos. 2 and 3 of Sami Malak's 9/27/85 memo.

PRESENT CONSIDERATION

In response to the deficiencies identified above, the petitioner submits a cover letter (11/12/85) from Nick Somma (Rhone-Poulenc) to Henry M. Jacoby (EPA) and a revised labelling (Section B). The deficiencies identified above are restated below, followed by the petitioner's response and RCB's comments/conclusions.

Deficiency No. 1

"A method trial for Rhone-Poulenc method #163 is required before we can conclude that the analytical method is adequate for enforcement purposes."

Current Situation for Deficiency No. 1

RCB has submitted a method trial request for Rhone-Poulenc method #163 to the Chemical Operation Branch, BUD (see Sami Malak's 2/3/86 memo).

RCB's Comment/Conclusion on Deficiency No. 1

Since the method trial is underway, RCB concludes that Deficiency No. 1 is still outstanding.

Deficiency No. 2

"The petitioner should revise Section B by adding a grazing restriction to the proposed label as follows: 'Do not allow livestock to graze on the floor of treated orchards.'"

The Petitioner's Response to Deficiency No. 2

In the current amendment, the sentence "Do not allow livestock to graze on the floor of treated citrus groves" was added to the proposed labelling (Section B) submitted previously on 6/26/85 (PP#5F3267, Acc. #073642).

RCB's Comment/Conclusion on the Petitioner's Response to Deficiency No. 2

RCB concludes that Deficiency No. 2 has been adequately resolved.

RECOMMENDATION

At this time, RCB continues to recommend against the establishment of the proposed tolerance for fosetyl-Al in or on citrus at 0.1 ppm because the method trial for Rhone-Poulenc method #163 has not been completed.

cc: R.F., Circu., W.T.Chin, TOX, EAB, PP#5F3267, EEB, PMSD-ISB
RDI: P.V.Errico(3/18/86), R.D.Schmitt(3/18/86)
TS-769: RCB: CM#2, RM812,557-4352, W.T.Chin,wc(3/18/86)