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EEE BRANCH REVIEW

DATE: IN 9/6/79 OUT 9/24/79 IN _____ OUT _____ IN _____ OUT _____

FISH & WILDLIFE

ENVIRONMENTAL CHEMISTRY

EFFICACY

FILE OR REG. NO. EUP

PETITION OR EXP. PERMIT NO. _____

DATE DIV. RECEIVED 8/27/79

DATE OF SUBMISSION _____

DATE SUBMISSION ACCEPTED _____

TYPE PRODUCTS(S): I, D, H, F, N, R, S _____

DATA ACCESSION NO(S). _____

PRODUCT MGR. NO. #21 (Jacoby)

PRODUCT NAME(S) Kiwi Lustr and Botran

COMPANY NAME _____

SUBMISSION PURPOSE EUP and temporary tolerance for the use

of DCNA and OPP on Kiwi fruit

CHEMICAL & FORMULATION 2,6-dichloro-4-nitroaniline 75% and orthophenylphenol

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(OPP) 2%

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Pesticide Name

Kiwi Lustr 277 concentrate with
fungicide = Orthophenylphenol 2% (OPP)

Botran 75 W = 2,6-dochloro-4-nitroaniline
75% (DNA)

100.1 Pesticide Uses

Dilute one gallon of Kiwi Lustr 277 Concentrate with fungicide with nine gallons of soft water. Add 104 grams Botran 75W (EPA Reg No. 1023 - 36) and continuously agitate the suspension. This will result in treatment levels of 2000 ppm OPP and DC NA each. Apply the above mixture through suitable spray nozzles at a rate of one gallon (of diluted wax) per 8-10,000 lbs of freshly cleaned Kiwi fruits travelling on rotating brushes or suitable wax applicator. A recommended cleaning procedure is a wash treatment of 50ppm of available chlorine by suitable equipment. Enough wax should be applied to wet the clean kiwi fruits but do not apply in excess. Let the fruits damp dry on equipment and store treated fruits at recommended storage temperature of 32°F.

107.0 Conclusions

The Ecological Effects Branch has no objection to the indoor use pattern described in this EUP application provided that the following labeling is added to all packaging:

"This product is toxic to fish. Do not discharge into lakes, streams, ponds, or public waters unless in accordance with an NPDES permit. For guidance contact your regional office of the EPA."

This labeling is necessary as our records indicate that Botran is acutely toxic to fish. EEB does not have orthophenylphenol fish toxicity data.

Robert K. Hitch

Robert K. Hitch
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Ecological Effects Branch

David Coppage 9/25/79

David Coppage
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Clayton Bushong
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Note to P.M.: Note that the Botran label specifically mentions that Botran 75W is compatible with captan. Captan may be presumed against by SPRD. If so the legal implications of encouraging its use may have to be considered.