031301

Date Out: EFB MAY 5 1981

To: Product Manager Stubbs (PM-41)
TS-767

FROM: Dr. Willa Garner III
Chief, Review Section No. 1
Environmental Fate Branch

Attached please find the environmental fate review of:

Reg./File No.: 81-NC-05, 81-VA-02

Chemical: DCNA (2,6-dichloro-4-nitroaniline)

Type Product: Fungicide

Product Name: Botran

Company Name: Upjohn

Submission Purpose: Use on peanuts.

ZBB Code: Sec. 18

ACTION CODE: 510

Date in: 4/28/81

EFB # 825, 826

Date Completed MAY 5 1981

TAIS (level II)	Days
51	2

Deferrals To:

_____ Ecological Effects Branch

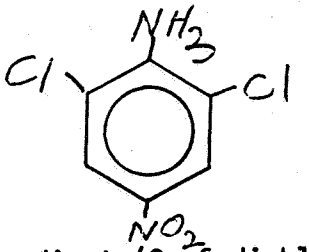
_____ Residue Chemistry Branch

_____ Toxicology Branch

1.0 INTRODUCTION

The states of Virginia and North Carolina have been requested Specific Exemptions under Section 18 for the use of Botran fungicide on peanuts for 1981.

1.1 Botran = 2,6-dichloro-4-nitroaniline



1.2 Botran 75W
Active ingredient (2, 6-dichloro-4-nitro aniline = 75%
inert ingredients = 25%

Directions for use on peanuts for control of Sclerotinia blight: Apply Botran 75W at 3.75lb a.i./acre at time of infection. A second application at the same rate may be made (Virginia). In North Carolina, multiple applications may be made, not to exceed 5lb/acre total. Preharvest intervals are specified as 30 days for Virginia and 14 days for North Carolina.

2.0 DISCUSSION

Virginia estimates that a maximum of 52,000 acres of peanuts will require treatment, while North Carolina estimates that 60,000 acres will be treated.

It is noted that Section 18 exemptions have been granted to Virginia for this use in 1977-1979, and 1978 and 1979 in North Carolina. This unusual practice was rationalized on the basis of need and an apparently sincere effort by the basic producer to generate data necessary to amend the Botran label.

EFB notes that peanuts are routinely rotated to other crops, including corn. Our data indicates this chemical my persist in soil. No rotational crop data have been submitted for this or any other use.

3.0 RECOMMENDATIONS

EFB cannot concur with the proposed Section 18 exemptions for these major crops and acreages without provision for prevention of residue accumulation in rotational crops. Therefore, a ~~18 month~~ 2 year crop rotation restriction or establishment of tolerances on rotated crops are recommended.

Henry Appleton

Henry Appleton
Chemist
Section I, EFB/HED