

JUN 30 1977

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Petition

*Forward
to
permissible
but not up in file*

*Am. safety
W. S. Cox
Review
of
LD 50
LD 50
LD 50*

PP# 6F1749 Chlorothalonil on peaches and cherries Amendment of 4/8/77.

R. B. Perfetti, Chemist,
Chemistry Branch Registration Division (MH-567)

Product Manager No. 21 (E. Wilson) and Toxicology Branch

Thru: Chief, Chemistry Branch

This amendment is in response to a reject letter of 8/3/76 which outlined certain deficiencies in the subject petition that required resolution before any favorable action could be taken. We will discuss these deficiencies and the petitioners response to them in the order in which they appeared in our memo of 6/2/76 (W. S. Cox).

Deficiency 1: Residues resulting from the proposed use on cherries may exceed the proposed 15 ppm tolerance. A tolerance of 25 ppm for cherries will be needed to cover such residues. This level will be adequate for cherries grown east of the Mississippi River.

Response to 1: The petitioner has submitted a revised Section F proposing a 25 ppm tolerance cherries. This proposal for cherries is adequate only for cherries grown east of the Mississippi. Pending the submission of the residue data on cherries grown in California requested below, we do not consider this deficiency resolved.

Deficiency 2: The data for fruit (peaches and cherries) grown in the Mountain and West Coast states are too meager to allow us to make any conclusions as to an adequate tolerance level for the proposed uses in these areas.

Response to 2: The petitioner has submitted 3 additional residue studies on peaches grown in California (2) and Oregon (1) and 2 studies on sweet and sour cherries grown in Oregon.

The studies on peaches reflected 3-5 applications of 1.5 and 3.0 lb active ingredient/100 gallons of spray (4.5 and 9.0 lb active ingredient/acre) and residues of the parent ranged from 4.0 to 34.0 ppm after 0 to 3 days and from 2.3 to 24.0 ppm after 7 to 8 days. Residues of the metabolite 4-hydroxy-2,5,6 trichloroisophthalonitrile ranged from 0.04 to 0.25 ppm with 0 to 3 day PHI's and from 0.02 to 0.22 ppm with 7 to 8 day PHI's.

While the data on peaches is limited it is our judgement that it demonstrates both that the level of residues of chlorothalonil and its metabolite resulting on peaches grown in California and Oregon are of the same magnitude as those levels found on peaches grown elsewhere and that the combined residues would not be expected to exceed 25.0 ppm under the proposed use.

The data on sweet and sour cherries reflected 4 applications of 1.5 and 3.0 lb active ingredient/100 gal spray (4.5 to 9.0 lb active) ingredient/acre and residues of chlorothalonil ranged from 1.0 to 23.2 ppm after 7 to 10 days. Residues of the metabolite 4-hydroxy-2,5,6-trichlorosophthalonitrile ranged from <0.01 to 0.06 ppm for the same PHI's.

Again we consider the data somewhat limited, however we consider it adequate to demonstrate the combined residues of the parent and its metabolite would not be expected to exceed 25.0 ppm on cherries grown in Oregon under the proposed use. We will, however, need additional data for cherries grown in California before any favorable recommendation can be made. This data is needed because of the ~~(different)~~ climatic conditions found in ~~this~~ major cherry producing area.

We do not consider this deficiency resolved.

Deficiency 3: The proposed uses do not involve any feed items and category 3 of Section 180.6(a) applies provided the petitioner amends to label to include a restriction against the grazing of treated archards.

Response to 3: The petitioner has submitted a revised Section 8 which includes the restriction, "Do not allow livestock to graze treated areas", for both uses.

We consider this deficiency resolved.

Recommendation

We recommend that the proposed tolerances not be established for the reasons given in our comments to deficiencies 1 and 2 above.

The petitioner should be informed that additional data on cherries grown in California is needed. This data should reflect the maximum proposed application rate and the maximum number of treatments possible. Depending on the results of the residue studies on cherries grown in California a revised Section F proposing a higher tolerance may be needed.

R. E. Perfetti, Ph.D