

Way
12-2-65

RE: rjj
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Evaluation of data for
Registration of Compound 4072
Application of October 28, 1965
by Shell Chemical Co.
Registration No. 201-143

INTRODUCTION

The chemical name for compound 4072 is 2-chloro-1-(2,4-dichlorophenyl)
Vinyl Diethyl Phosphate.

An earlier application was reviewed by R. Thomas on August 16, 1965.
His comments were as follows:

1. Please submit representative chromatograms for potatoes and cole
crops which reflect treated, check, and recovery samples!
2. Since immature potatoes are used as food, we should have some
residue data on tubers in various stages of maturity.
3. The directions for use on cole crops should be more restrictive
in that some post-harvest interval or cut off time for treatment
should be specified.

CONCLUSIONS

Shell submitted with their letter of October 28, 1965, the following
answers to the questions asked by R. Thomas.

1. Chromatograms have been sent.
2. Shell said that they were not aware that immature potatoes constitute
a significant portion of the diet. If this can be established, it
would be necessary to define what stages of tuber maturity residue
data should be obtained to be meaningful. Answer - Immature pota-
totes are marketed for human consumption. We would like residue
data on immature potatoes about one inch in diameter to normal
harvest.
3. Shell has added a cut off time to cole crops as follows: "Do not
apply later than 4 weeks after transplanting."

RECOMMENDATIONS

It is concluded that the proposed use not be registered for the following reasons:

1. Since, immature potatoes are marketed for human consumption, we would like residue data on potatoes approximately from one inch in diameter to normal time of harvest.
2. Add a caution to the label such as, do not harvest immature potatoes for food or feed. *Delete*