

ppFile

3F1410

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

SUBJECT: PP# 3F1410 and FAP# 3H4033. Benomyl on citrus.
Comments on Amendments of 12/7/73.

DATE: FEB 1 1974

FROM:

TO: Coordination Branch
and Toxicology Branch, RD

This amendment is in response to the COB reject letter of 11/27/73.
There were four deficiencies listed in this letter.

Deficiency 1. The residue data submitted for preharvest applications do not reflect the proposed usage. There is no limitation as to the number of applications a grove would normally receive. Where data are submitted on multiple applications the doses are low and the PHI is excessive. Data are needed to reflect the proposed use.

Petitioners Response 1. The label has been changed to specify single applications of Benomyl for preharvest treatment of Scab, greasy spot and normal preharvest spray for fruit decay (green mold, blue mold, and stem-end rot). Upon re-evaluation of the residue data, we conclude that residues resulting from the proposed pre-harvest use involving one treatment will be less than 5 ppm.

Conclusions 1. We consider deficiency 1 satisfied.

Deficiency 2. There are no data to determine maximum residue levels when postharvest control of penicillium is necessary.

Petitioners Response 2. The petitioner has retabulated the new and existing data to more clearly reflect the various uses. For oranges a postharvest treatment using 4 lbs. benomyl per 100 gal. (or 5000 ppm) resulted in residues of 5.4 ppm. All other treatments for various types of citrus at 2 lbs. and 4 lbs. benomyl/100 gals. (or 1250 and 2500 ppm respectively) resulted in residues ranging from 1.3 to 4.5 ppm.

We conclude that residues resulting from the proposed post-harvest treatment will not exceed 5 ppm.

Furthermore, we can conclude that even if fruit were to receive both pre - and post-harvest treatment, residues of benomyl would not exceed the proposed 10 ppm tolerance.

Note: The petitioner has informed us (and Mr. C. Grable, Ecological Effects Branch concurs) that fruit destined for the processing market would not likely receive a post-harvest treatment to guard against the diseases to be controlled by benomyl. These fruit would receive only pre-harvest treatment. Likewise, fruit intended for the fresh market would likely only receive a post-harvest treatment.

Conclusion 2. We consider deficiency 2 satisfied.

Deficiency 3. Since we cannot draw any conclusions as to what the maximum residues will be in the fruit we must defer judgment on an adequate food additive tolerance level until more relevant data are available.

Petitioners Response 3. By limiting the proposed uses to single applications, the data submitted are now adequate to evaluate the food additive tolerance level. Based on our comments under # 2 above, fruit for processing would not likely receive a post-harvest application. Residues from pre-harvest treatment alone did not exceed 1.9 ppm (Maximum residue found was for tangelos at 3 applications with a 20 day PHI). Therefore, based on a concentration factor of 10X (from fresh fruit to dried citrus pulp), residues would be under 50 ppm in dried citrus pulp.

Conclusion 3. We consider a food additive tolerance of 50 ppm on dried citrus pulp to be adequate.

Deficiency 4. We cannot make a Sec. 180.6(a) conclusion until the question of residue levels in the actual feed item is resolved.

Petitioners Response 4. The question of actual residue levels in the feed item have been adequately resolved. Furthermore, a tolerance level of 70 ppm in dried apple pomace is already established (PP# 1F1033 and FAP# 2H5009).

Since dried citrus pulp would be substituted for dried apple pomace in the livestock diet, the proposed 50 ppm citrus pulp tolerance would not increase the benomyl level in the diet. Therefore the established meat and milk tolerances are adequate to cover any residue transfer to these commodities from the feeding of citrus pulp derived from treated fruit.

Conclusion 4. Deficiency 4 is adequately resolved.

Recommendations

Toxicological considerations permitting, we recommend establishing the proposed tolerance of 10 ppm for citrus (from preharvest and/or postharvest application) and a food additive tolerance for residues in dried citrus pulp at 50 ppm.

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Additional Comments

In a memo of conference (Beyak, 1/7/74) and in a subsequent telephone conversation (Bellet and Rosen 1/8/74) it was agreed by DuPont to include a statement on the label restricting the allowable immersion of citrus in postharvest treatments to 5 min. This additional comment will appear on the final label.

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PP# 3F1410
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Reading File

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1/31/74
RD/I-J.G. Cummings: 1/29/74
RD/I-R.S. Quick: 1/14/74