

Chevron

ORTHENE

Chevron Chemical Company
940 Hensley Street, Richmond, CA 94804

August 13, 1975

ORTHENE 75 S (Grapes)
EPA Temporary Permit 239-EXP-71G
PP 5G1604 and FAP 5H5081

Director, Registration Division (WH-567)
Environmental Protection Agency
Waterside Mall, East Tower
Washington, D.C. 20460

Dear Sir:

Please refer to your letter of July 22, 1975 stating that the application for extension of the permit is not acceptable.

We request that these petitions be placed in abeyance until December 19, 1975 to permit completion of analysis of residue samples of grapes, raisins, raisin waste, wine and pomace from the 1975 permit trials.

With reference to paragraph 3 of your letter of July 22, there should be no objection to our conducting trials on our own Western Field Research Station at Fresno at the 1.5 lb. per acre rate. In this case, does the experimental label have to be revised to include the 1.5 lb. rate? This is an important point which may also be involved in future experimental programs. Is it not permissible to conduct phytotoxicity trials at higher rates on established experiment station plots? It would seem inappropriate to indicate such high rates on the experimental label on the product supplied to growers for normal performance tests at the 0.5 to 1 pound active/acre rate. Paragraph 4 of Temporary Permit 239-EXP-74G for ORTHENE 75 S on Almonds issued July 10, 1975 instructs us to test for phytotoxicity at higher rates than shown in the general directions for use on the label.

Concerning paragraph 4 of your letter, we believe there is no hazard to birds or small animals in grape vineyards. Our position is based on no incidents of bird or mammal intoxication or mortality in vineyards thus far treated - plus considerable experience of use of the product in other crops in the same regions (cotton, lettuce). We have already submitted very detailed toxicology study reports on ducks (acute and reproduction tests), quail (subacute, reproduction and dermal tests), pheasants (acute test), chicken (oral, demyelination and reproduction tests) and English sparrow (dermal, perching bird study). Rabbit, rodent and other mammal studies likewise do not indicate any hazard to small mammals in vineyards. It is our intention to report observations of any cases of bird or mammal intoxication or mortality in the 1975 experimental permit trials now underway. We see no need for a detailed protocol to report such observations.

Yours very truly,

J. N. Ospenson
J. N. Ospenson, Manager
Research & Development

JPT:sag

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