

DATE:

SUBJECT: Memorandum of Conference on Triforine

OFFICE COPY

FROM: John H. Onley, Ph.D., Chemist  
Residue Chemistry Branch, HED (TS-769)

*John H. Onley*

TO: Willa Garner, Ph.D., Acting Chief  
Residue Chemistry Branch, HED (TS-769)

*Will*

THRU: Robert S. Quick, Section Head  
Petition Evaluation Section  
Residue Chemistry Branch, HED (TS-769)

*J. Onley for R. S. Quick*

Richard D. Schmitt, Deputy Chief  
Residue Chemistry Branch, HED (TS-769)

*R. D. Schmitt*

On December 1, 1980, a conference on triforine was held between:

S. Pouliot	EM Industries, Inc.
H. Knoll	EM Industries, Inc.
H. Jacoby	Registration Division
R. Quick	Residue Chemistry Branch, HED
J. Onley	Residue Chemistry Branch, HED

In essence, the conference dealt with our reviews on the following petitions:

1. OF2151 - Triforine on Stone Fruits.
2. OF2152 - Triforine in or on tomatoes, peppers, eggplants, strawberries, melons and cucumbers.
3. OF2153 - Triforine in or on almonds and apples.

During the proceedings of the meeting, EM Industries, Inc., made the following commitments:

Petition No. OF2351

1. Section B will be revised wherein the maximal application rate will be 0.6 lb. (9.6 ozs. a.i.)/A.
2. With the exception of California, the proposed use on peaches, nectarines and apricots will contain a maximal of 3 blossom plus 3 pre-harvest applications. In California, the proposed use will contain no more than 3 blossom + 2 pre-harvest + 1 post-harvest applications per growing season.
3. The proposed use pattern will contain a maximal dipping time and will state dosage in terms of pounds of fruit to be dipped in gallons of solution or treated with pounds or grams of product.

4. Revised Section F wherein the proposed tolerances on peaches, nectarines and apricots will be 8 ppm.
5. A revised Section B/label will contain a post-harvest restriction on plums that are to be dried.
6. The petitioner will submit an explanation as to why spray applications of Funginex WP formulations will yield higher triforine residues than the Funginex Emulsifiable Concentrate formulation.

Petition No. OF2352

- 1a. The petitioner will provide more proof that will show tomatoes imported from Mexico will be used only on the fresh market. If this cannot be shown, a tomato processing study along with tolerances/ food additive tolerances (if needed) on tomatoes and tomato fractions will be submitted at a later time.
- 1b. A large animal (lactating ruminant) metabolism/feeding study will be submitted if it cannot be shown that Mexican tomatoes are only used on the fresh market.
2. Sections B and F will be revised; the petitioner will propose the establishment of tolerances for triforine residues on the following raw agricultural commodities:

peppers, bell	5.0 ppm
eggplants	1.0 ppm
strawberries	2.0 ppm
cantaloups/watermelons	1.0 ppm
cucumbers	0.5 ppm

Petition No. OF2353

1. Residue data will be submitted on dry apple pomace.
2. A revised Section F will contain the following proposed tolerances:

Almond	0.01 ppm
Almond, hulls	0.1 ppm
apples	0.1 ppm
apple pomace, wet	0.4 ppm
apple pomace, dry	(unknown at this time)

3. A large animal (lactating ruminant) metabolism/feeding study will be submitted.

TS-769:RCB:J. Onley:gs:CM#2:RM810:12/6/80

cc: RF, Circ., J. Onley, Watts, Jacoby, Barton, FDA, TOX, EEE, EFB,

PP#s 2151, 2152, 2153

RDI: Robert S. Quick:12/4/80