8-15-79

15 AUG 1979

PP# 8G2087, Experimental Use Permit 359-EUP-58, Rovral on stone fruits
Amendment of 6/27/79 including revised Section B.

S. Hummel, Chemist, RCB, HED (TS-769)

H. Jacoby, PM 21, FHB, RD (TS-767) and TOX

THRU: Chief, RCB, HED (TS-769)

Rhone-Poulenc, Inc. amends the petition PP# 8G2087 in response to deficiencies outlined in EPA (H. Jacoby) letter of 3-9-79. We will list each deficiency, the Rhone-Poulenc response and our comments.

Deficiency 1

The proposed use patterns should specify each crop and the tolerance should be proposed for each of the crop sites claimed.

Rhone-Poulenc submits a revised label in which "stone fruits" has been changed to "apricots, cherries, nectarines, peaches, plums, and prunes." No revised Section F has been submitted.

This revision in Section B is acceptable. However, a revised Section F must be submitted. The tolerance should be for residues in apricots, cherries (sweet and sour), nectarines, peaches and plums (fresh prunes) rather than the crop group stone fruits as stated in the EPA letter of 3-9-79. The revised Section F must be worded as above.

We do not consider this deficiency resolved.

Deficiency 2

The application rate should be in terms of pounds of product per 100 gallons of spray volume, with a maximum number of gallons per acre, rather than pounds per acre.

Rhone-Poulenc submits a revised Section B to which the following has been added after "Apply as a foliar spray in sufficient water to obtain through coverage.": (100-400 gallons per acre by gound application and 5 to 15 gallons by aerial application.)." However, the application rate is still given in "lb ai/A."

1/3

As stated in the EPA letter of 3-9-79, Deficiency 2, the application rate should be in terms of pounds of product per 100 gallons of spray volume, rather than pounds per acre.

We do not consider this deficiency resolved.

Deficiency 3

A restriction against grazing livestock in treated orchards and against feeding treated cover crops to animals should be added to the label.

The revised label adds this restriction.

We consider this deficiency resolved.

Deficiency 4

The subject petition for a temporary tolerance cannot be accepted until you have submitted storage data which show that the residues are stable in storage for periods up to 2½ years. However, a tolerance level of at least 40 ppm will be needed to cover residues in the raw agricultural commodities and dried prunes from the proposed 2 pounds per acre application rate.

Additional data have been submitted. Rhone-Poulenc, Inc. has taken the samples which were used to generate the original residue data in PP# 8F2087 (stored up to 2½ years), and reanalyzed the samples. This was done approximately one year after the last analysis. The data, while somewhat erratic, do not show consistent decline of residues in the samples. These data will be sufficient as storage stability data for the temporary petition. The petitioner has already been asked for additional residue data for a permanent tolerance request.

The application rate in the revised Section B has been changed from a maximum of two pounds per acre to a maximum of one pound per acre. Data submitted previously (A. Rathman, 3-2-79) indicate that the residues from the one pound rate would be 20 ppm. Section F of the petition proposed tolerance of 20 ppm.

We consider this deficiency resolved.

Conclusions

1. A revised Section F must be submitted. The tolerance should be for residues in apricots, cherries (sweet and sour), nectarines, peaches, and plums (fresh prunes) rather than the crop stone fruits.

2. The application rate should be in terms of pounds of product per 100 gallons of spray volume, rather than pounds per acre.

Recommendations

We recommend against the proposed tolerance for the reasons outlined in Conclusions 1 and 2. The petitioner should be advised of our conclusions and reminded of the requirements for permanent tolerance stated in the EPA letter of 3-9-79.

RDI:A.Rathman:3-7-79:JGCummings:8-8-79
TS-769:RCB,S.Hummel:JP:X77484:Rm810:8-14-79
cc: EEE, TOX, CHM (3)