



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JUN 11 1982

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

Subject: PP#2F2595 Ronilan on lettuce. Amendment of 5/11/82.

From: K.H. Arne, Ph.D., Chemist *R. J. Quick for*
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

Thru: Charles L. Trichilo, Chief
Residue Chemistry Branch
Hazard Evaluation Division (TS-769) *[Signature]*

To: Henry Jacoby, PM No. 21
Registration Division (TS-767)

and

Toxicology Branch
Hazard Evaluation Division (TS-769)

In our review of this petition (memo of 4/23/82, K. Arne) we recommended against the proposed tolerance on lettuce. For a favorable recommendation we required the following:

1. An explanation of the high check values for Ronilan and/or appropriate revisions to the analytical method to reduce the check values.
2. A revised Section F in which a tolerance of 10 ppm is proposed for head lettuce.
3. A revised Section B in which label restrictions limiting this use to head lettuce, and establishing a 28 day PHI are imposed. The proposed use should also be changed to limit this use to two applications per season for trans-planted lettuce.

With this amendment the petitioner has submitted the following responses to these deficiencies.

1. The high check values are claimed to be due to contamination resulting from drift. Since most of the check values are low, only in a New York location were high values found, we find this argument reasonable. This deficiency is resolved.
2. A revised Section F has been submitted. A tolerance of 10 ppm is proposed for head lettuce. This deficiency is resolved.
3. A revised Section B has been submitted. The PHI has been extended to 28 days and only two applications are allowed to transplanted lettuce. This deficiency is resolved.

Recommendation

Toxicological considerations permitting, we recommend for the proposed tolerance of 10 ppm for residues of Ronilan on lettuce.

TS-769:KArne:vg:CM#2:Rm810:X77377:6/2/82
cc:RF, Circ., Arne, Thompson, FDA, TOX, EEB, EFB, PP#2F2595
RDI: Quick, 5/28/82; Schmitt, 5/28/82