11 30 82

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

NOV 30 1982

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

Subject: PP#2F2650 Ronilan on stonefruit. Amendment of 10/5/82

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

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

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

and

Toxicology Branch
Hazard Evaluation Division (TS-769)

In our review of this petition we recommended against the proposed tolerances on peaches, cherries, and plums (memo of 6/11/82). For a favorable recommendation we required the following:

1) A revised Section B in which a PHI of 14 days is proposed for peaches.

2) A revised Section F in which a tolerance of 10 ppm is proposed for peaches.

3) Residue data reflective of maximum proposed use for cherries and plums.

4) Residue data should be submitted for dried prunes processed from fresh fruit bearing residues at or near the proposed tolerance level. An appropriate food additive tolerance should be proposed, if needed, for dried prunes.

In response to these deficiencies the petitioner has submitted a revised Section F in which a tolerance of 25 ppm is proposed for stonefruit. The petitioner refers to a 5/13/82 FR notice, p 20635-39 in which a crop grouping scheme that would accommodate this tolerance is proposed.

Section B has been revised to propose use for stone fruit rather than for cherries, peaches, and plums. No additional residue data are submitted. Also, the petitioner argues that no food additive tolerance is needed for prunes as the proposed 25 ppm tolerance is high compared to the highest residue found on plums (ca. 2 ppm); presuming a maximum concentration factor of 4X no residue greater than 8 ppm would be found on prunes.

Conclusions

1. Since the crop grouping scheme has not yet been established the proposed tolerance for stonefruit is inappropriate.

2. Even if the crop group tolerance were established at this time we would not consider the petitioners argument that a food additive tolerance for prunes is unnecessary to be sound. Even though the data show no residues higher than 2 ppm on plums, the residues on cherries ranged up to 15 ppm in one instance. Because of the similarity in these crops we would expect similar residue levels in plums/prunes if the petitioner were to submit the additional plum residue data we requested. The only way to establish whether a food additive tolerance is needed would be to dry plums carrying residues at or near the proposed tolerance level and determine residues in the resulting prunes.

Recommendation

We recommend against the proposed tolerance. For a favorable recommendation the petitioner should address the deficiencies noted in our original review.

RCB expects to complete its input to the crop grouping scheme on or before April, 1983 and notes that the scheme may be revised in response to comments from the public. If the petitioner wishes he may wait until this scheme is established and then pursue such a tolerance. As is now proposed this will require residue data for representative crops, i.e., apricots, sour cherries, peaches, plums and fresh prunes. A major weakness of this petition is a lack of residue data for cherries and plums reflecting the maximum proposed use in terms of both the amount of fungicide applied and the PHI. Regardless of the course the petitioner chooses additional residue data representative of the maximum proposed use will be needed as well as a plum to prune processing study.

TS-769:RCB:KArne:vg:CM#2:Rm810:X77377:11/26/82
cc: RF, Arne., Perfetti, Thompson, FDA, TOX, EEB, EFB, PP#2F2650
RDI: Quick, 11/19/82; Schmitt, 11/22/82

INTERNATIONAL RESIDUE LIMIT STATUS

K. Arne

CHEMICAL Ronilan

PETITION NO. 2F2650

CCPR NO. none

CODEX STATUS

[X] No Codex Proposal Step 6 or above

RESIDUE (If Step 9): _____

Crop(s)	Limit (mg/kg)
none	

PROPOSED U.S. TOLERANCES

RESIDUE: parent plus metabolites containing 3,5-dichloroaniline moiety

Crop(s)	Tol. (ppm)
stonefruit	25 ppm

CANADIAN LIMIT

RESIDUE: _____

Crop	Limit (ppm)
none	

MEXICAN TOLERANCIA

RESIDUE: _____

Crop	Tolerancia (ppm)
none	

NOTES: