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

MAR 6 1984

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PESTICIDES AND TOXIC SUBSTANCES

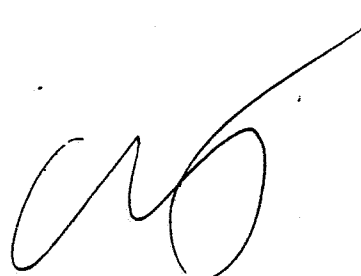
MEMORANDUM

PP#2F2650: Ronilan on Stone Fruit. Amendment of 2/9/84
Accession number: 252399.

FROM: Karl H. Arne, Chemist *HAme*
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 original review of this petition we noted the following deficiencies:

1. A revised Section B in which a PHI of 14 days is proposed is needed.
2. A revised Section F in which a tolerance of 10 ppm is proposed is needed.
3. Residue data reflective of the maximum proposed use for cherries and plums are needed.
4. Residue data should be submitted for dried plums that are processed from fresh fruit bearing residues at or near the tolerance level. If needed, a food additive tolerance should be proposed for dried prunes.

In a subsequent amendment (see memo of 11/30/82) the petitioner proposed tolerances for the crop group stone fruit at 25 ppm and revised the label accordingly. The above deficiencies were not addressed. We did not consider the group tolerance proposal to resolve these deficiencies because, among other things, the crop group scheme had not been established; it had been only recently proposed. (The crop grouping scheme has since been established: FR Vol. 48, No. 126, p29855)

With this amendment the petitioner has submitted additional

residue data, summarized in the following table. Only data from experiments that incorporated PHI's of 3 days or less or resulted in residues of greater than 5 ppm are included. (The maximum proposed use involves up to 5 applications of 1 lb a.i./A at a PHI of three days.)

Residues of Ronilan on Stone Fruit				
Crop	rate lb. ai/A	number of applications	PHI (days)	Residue (ppm)
apricots	1	2	0	7.9
apricots	1	2	1	11.3
apricots	1	2	3	14.2
apricots	1	3	0	13.5
apricots	1	3	1	10.3
apricots	1	3	3	11.6
cherries	0.75	3	0	0.87
cherries	0.75	3	3	0.78
cherries	3	5	0	12.4
cherries	0.75	3	0	14.8
cherries	0.75	5	0	11.2
cherries	0.75	7	3	0.39
cherries	0.75	7	3	0.46
cherries	0.75	7	3	0.49
cherries	0.75	4	3	0.58
cherries	0.75	7	3	9.6
cherries	0.75	7	3	1.2
nectarines	1	3	1	1.8
peaches	1	2	0	3.5
peaches	1	3	1	4.3
peaches	1	3	3	3.5
peaches	1	3	5	2.8
peaches	2	2	3	1.0
peaches	1.5	2	3	1.2
peaches	2	2	3	2.1
peaches	1	9	1	21.0
peaches	1	9	1	27.5
peaches	1	9	0	3.6
peaches	0.5	6	0	1.8
peaches	0.5	6	3	1.5
peaches	0.75	6	0	2.7
peaches	0.75	6	3	2.6
peaches	1	6	0	3.0
peaches	1	6	1	2.1
peaches	0.5	6	3	3.1
peaches	1	6	2	1.5
peaches	1	9	0	0.89
peaches	1	6	0	16.4
peaches	1	6	0	18.9
peaches	0.75	9	0	3.4
plums	1	2	0	0.34
plums	1	3	0	0.87
plums	1	3	3	0.86
plums	0.75	9	0	2.0
plums	1	2	14	5.2✓

Based on these data the petitioner continues to propose a tolerance of 25 ppm for stone fruit. Few data are from experiments strictly representative of the proposed use. Nevertheless, there are enough data that approximate the maximum proposed use to support the proposed tolerance.

Residue data are also presented for fresh prunes and dried prunes, and it appears that higher residues are expected in dried prunes, but it is difficult to determine a concentration factor because the same fruit were not analyzed both fresh and dried. Therefore, to determine a concentration factor, we will use a dry down factor. Normally, 2 1/2 to 3 pounds of fresh prunes are required to produce 1 pound of dried prunes. The maximum potential concentration factor is therefore 3x, and based on data for cherries we expect residues in fresh prunes that may approach the tolerance level of 25 ppm. Therefore a food additive tolerance of 75 ppm is needed for dried prunes.

Conclusions and Recommendations

The submitted data, along with the 25 ppm tolerance proposal for stone fruit, resolve all RCB deficiencies associated with this petition, except that a food additive tolerance proposal of 75 ppm for prunes is needed and should be proposed in a food additive petition.

TS-769:KHA:RCB:CM-2:RM810:557-7377
CC:RF,Circ.,KHA,TOX,EEB,EAB,FDA,Thompson,PP#2F2650
RDI:JHO,3/6/84; RDS, 3/6/84