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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

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MEMORANDUM

OFFICE OF PESTICIDES AND TOXIC SUBSTANCES

SUBJECT: 24(c) REGISTRATION FOR THE USE OF ZINEB ON GUAVAS

FROM: E. Zager, Chemist
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TO: Henry Jacoby PM 21
Registration Division, (TS-767)

THRU: Chuck Trichilo, Chief
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

Rohm and Haas Company requests a Special Local Needs Registration for the use of Dithane Z-78 (75% zineb) to control fungal diseases of guava fruits.

A tolerance of 7 ppm is established for residues of zineb in or on guavas (§ 180.115). Apparently there is no registered use of zineb on guavas.

The proposed use would permit multiple spray applications of Dithane Z-78 at the rate of 0.75 - 1.875 lbs act/100 gals of water. Applications are to be made at 1-2 week intervals. There is a 7-day PHI.

Residue data submitted with this request reflect a single application to guavas at the rate of 1.875 - 3.75 lbs act/A. The concentration of the applied spray is not given. The analytical method used to generate the residue data has not been described. Limited validation data have been submitted. Zineb recoveries ranged from 78-83% at the fortification levels of 0.4 - 2.0 ppm while 96% of ETU was recovered at a 0.53 ppm fortification level. Residues of zineb in or on whole fruit at a 7 day PHI ranged from 0.74 - 0.84 ppm from the 1.875 lb act/A application rate and were 2.1 ppm from the 3.75 lb act/A rate. Residues of ETU were 0.008 ppm and 0.009 ppm, respectively.

There are no available residue data reflecting the proposed multiple applications of zineb to guavas.

Conclusions and Recommendations

In the absence of residue data reflecting multiple applications of zineb to guavas we are unable to determine whether residues resulting from the proposed use will exceed the established tolerance of 7 ppm. Consequently, we recommend against this 24(c) registration.

For a further consideration of this request the petitioner should submit:

- a) Details of the analytical method used to generate the residue data.
- b) Residue data reflecting multiple applications of zineb to guavas (The application rates for these studies should be expressed in terms of lbs active /100 gals of spray as on the proposed label).

CC: Zineb SF
Sec 24(c) SF,
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