DATE: September 16, 1976

SUBJECT: Tolerances for 2,4-D on any RAC produced in the soil, at 1 ppm

FROM: Toxicology Branch

Through: Dr. M.H. Rogoff, Pesticide Science Officer

TO: Special Registration Section (Minor Uses)

Pesticide Petition No.: 6E1608

IR-4 Project

Conclusion:

1. Following a discussion on this petition with Dr. M. Rogoff (PSO) we refer this request to him for response.

2. The petitioner is correct in stating that a 1.0 ppm tolerance on a number of rac groupings is established (180.142 (f)) but these tolerances were established in conjunction with the use of 2,4-D on water hyacinths, and not for uses on the particular crops per se. On the other hand we will and we have established tolerances for specific uses and crops (no tox objections) on such items as filberts (the example used by the petitioner), however, in this instance (petition No.: 1776) only a 0.1 ppm tolerance was requested and needed but not a 1.0 ppm level. We always have followed the principle to keep tolerances as low as possible, while reflecting the agricultural needs, and we have never given "blanco" tolerances at a level which was not substantiated by the particular use.

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