US EPA ARCHIVE DOCUMENT

7-29-81

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE: July 29, 1981

SUBJECT: Memorandum of Conference held 4/7/81 on Chlorothalonil on citrus

FROM: Lynn M. Bradley, Chemist
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

TO: RCB Office Files

THRU: Charles L. Trichilo, Chief
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Hazard Evaluation Division (TS-769)

Attendees:

Ralph Burton	Agricultural Chemicals Division, Diamond Shamrock
Gary Eilrich	Argicultural Chemicals Division, Diamond Shamrock
Jerry Lucietta	Argicultural Chemicals Division, Diamond Shamrock
Don Stallard	Agricultural Chemicals Division, Diamond Shamrock
Henry Jacoby	Registration Division, EPA
Robert S. Quick	Residue Chemistry Branch, HED, EPA
Lynn M. Bradley	Residue Chemistry Branch, HED, EPA

The Diamond Shamrock representatives came to discuss the outstanding deficiencies in PP#OF2405, chlorothalonil on oranges and grapefruit.

It was agreed that the label restriction would be altered to read "do not apply when previous year's crop is on the tree." This should give a minimum PHI of ca. 80-90 days and circumvents the problem of defining "mature fruit" for varieties of oranges which may have begun producing the current year's crop while the previous year's fruit are "stored on the tree", awaiting harvest.

Diamond Shamrock wishes to register this use only in Florida, whereas we normally require residue data from all major growing areas for a permanent tolerance. They intend to provide documentation that California growers do not use fungicides as these diseases are not found in CA, but will provide residue data from Texas, although they claim that fungicides are not used in TX, even though fungus diseases may be found there.

Inquiry concerning a group tolerance (citrus) vs. a tolerance for oranges and grapefruit only revealed that, at minimum, more than one study on lemons or limes, in addition to orange and grapefruit data, would be necessary.

Diamond Shamrock now understands that the processing study (using washed fruit) cannot be used to satisfy our questions concerning the surface extraction method of analysis. They will conduct the requested method comparison (maceration vs. surface extraction) on unwashed whole mature fruit treated 3 times and harvested at 0, 14 and 28 days after treatment.

Control, recovery and treated samples will be analyzed for chlorothalonil, 4-hydroxy chlorothalonil, HCB and PCBN.

There is apparently some question as to whether HCB residues from the pesticide will be detectable at levels above existing levels from environmental contamination.

Assuming that no "surprises" arise from the method validation studies (above) and given that the PHI will be close to 100 days rather than the 30 days we had requested in our review, we do not expect that meat and milk tolerances will be necessary.

Several general questions were presented by the Diamond Shamrock people. They wanted to know about restricting feed use of almond hulls for a temporary tolerance to avoid needing meat and milk tolerances (yes), and whether we would accept a restriction against feeding wheat straw for a permanent. It was stated that we have not accepted such a restriction on wheat straw in the past and it was suggested that in support of proposing such a restriction, perhaps they could provide documentation on the economics involved in baling and selling wheat straw.

TS-769:RCB:L.Bradley:gs:X77324:CM#2:RM810:7/29/81
cc: RF, Circ.(3), L. Bradley, PP#OF2405, PP#OF2438
RDI: Nelson for Hummel, 7/24/81: Schmitt, 7/27/81