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

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OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

Subject: PP#2F2602. Chlorothalonil on stone fruits. Amendment of 5/7/82.

From: R.S. Quick, Chemist *R. S. Quick*  
Residue Chemistry Branch  
Hazard Evaluation Division (TS-769)

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

To: Henry Jacoby, PM# 21  
Registration Division (TS-767)

and

Toxicology Branch  
Hazard Evaluation Division (TS-769)

In our K. Arne review of 5/03/82 we stated that for a favorable recommendation the petitioner should propose a tolerance for apricots, peaches and nectarines at 0.5 ppm. The revised Section F is in accord with this recommendation and this deficiency is resolved.

We had also requested that Section B be revised to express the application rate as lb. act/100 gal applied to runoff or an equivalent amount applied as a low volume spray. The petitioner does not wish to make this change, stating that dosage in pints active per acre is the most accurate way of recommending use and reflects university extension philosophies for how fungicide recommendations should be given.

We still believe that dosage for tree fruits should be given in terms of lbs. active ingredient/100 gallons of dilute spray. To recommend in terms of lbs. active/acre means that small trees will receive much more active ingredient and thus higher levels of residue deposit than large trees. The petitioner should be asked to make his label recommendation for chlorothalonil on tree fruits in terms of "Apply X pints/100 gallons in a dilute spray to run-off. For concentrate spray, apply an equivalent amount of active ingredient per acre".

The product manager should query the petitioner to see if this would be acceptable. The product manager should explain to the petitioner that application of X lbs. per acre applied to small trees can deposit higher residues than the same amount applied to larger trees.

We withhold a favorable recommendation until this question is discussed with the petitioner.

TS-769:RCB:RQuick:vg:CM#2:Rm810:X77377:5/21/82  
cc:RF, Circ., Quick, Thompson, FDA, TOX, EEB, EFB, PP#2F2602  
RDI: Schmitt - 5/20/82