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WASHINGTON, D.C. 20460

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OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

AUG 6 1982

MEMORANDUM

Subject: PP#2F2602. Chlorothalonil on stone fruits. Amendment
of 6/11/82

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

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

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

and

Toxicology Branch
Hazard Evaluation Division (TS-769)

In our previous review of this petition (memo of 5/24/82 by R. Quick), we made certain recommendations as to how the dosage rate should be given on the label for this orchard use. The petitioner wishes to give use rate directions in terms of pints of formulation/A for fruit trees. We had requested that the dosage rate be given both in terms of "lbs. act./100 gals in a dilute spray to run-off" and for concentrate sprays in terms of "apply an equivalent amount of active ingredient per acre". This suggestion from us would have taken into account differences in tree size.

In the present amendment, the petitioner summarizes the residue data and concludes that residues tend to be higher on fruit from larger trees rather than fruit from smaller trees. He does indicate a willingness to "compromise" and indicate on the labeling that higher application rates are to be made on mature trees rather than on young immature trees.

We recognize the petitioner's concern over this problem because it is based on a trend to use concentrate sprays in the treatment of orchard crops. As a result, many labels being submitted have application rates in terms of lbs./A. rather than the more traditional lbs./100 gals. with a full cover spray to run-off. We have come across a label in a recent petition submission (P.M., see attachment) which handles the problem very well so that the correct amount of pesticide is applied/A. regardless of tree size or the number of trees/acre. The application rate on the label is given in two columns, one for lbs./100 gals. and one for lbs./A. The column for dosage in terms of lbs./A is asterisked to explain that the rate for this column is based on a standard of x gallons of dilute spray per acre, or the equivalent amount of product per acre in concentrate sprays. The label also bears the following additional instructions for clarification: "In order to apply the correct amount of product to your orchard, you must know the number of gallons of water needed to spray one acre of your trees to the point of drip. If you do not already know this gallonage, you should conduct a test to determine it. If you do not know how to conduct such a test with your equipment, you should ask for assistance from your equipment dealer".

We suggest that the Product Manager relay this example (with product and Company names blocked out) to the petitioner for his consideration. We believe that this alternative labeling would provide an improved label and that it might be acceptable to the petitioner.

Recommendation:

We still withhold our favorable recommendation for the proposed tolerance. The Product Manager should relay our above suggestions to the petitioner for his consideration.

TS-769:RCB:Quick:vg:CM#2:Rm810:X77377:8/4/82
cc: RF, Circ., Quick, Thompson, FDA, TOX, EEB, EFB PP#2F2602
RDI: Schmitt, 8/4/82