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

6-25-92
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JUN 25 1992

OFFICE OF
PESTICIDES AND TOXIC
SUBSTANCES

MEMORANDUM

SUBJECT: D #173993: Amended Use, 050534-00008: Chlorothalonil (Bravo® 720, Bravo® 500 and Bravo® 90DG) in or on Passion Fruit grown in Florida (MRID #420590-01, CBTS #9387, #9388 and #9389),

FROM: W. T. Chin, Ph.D., Chemist *W. T. Chin*
Tolerance Petition Section III
Chemistry Branch Tolerance Support I
Health Effects Division (H7509C)

THRU: P. V. Errico, Section Head *P. V. Errico*
Tolerance Petition Section III
Chemistry Branch Tolerance Support I
Health Effects Division (H7509C)

TO: Joanne Miller, PM #21
Fungicide-Herbicide Branch
Registration Division (H7505C)

BACKGROUND

In response to the deficiency identified in W. T. Chin's 2/3/92 memo, the petitioner, ISK Biotech, submitted labels of Bravo® 720, Bravo® 500 and Bravo® 90DG. The deficiency is restated below, followed by the petitioner's response and CBTS' comment/conclusion.

DEFICIENCY REMAINING TO BE RESOLVED

The petitioner is requested to revise the proposed label of Bravo® 720 as specified below. Also, residue data are needed for the Bravo® 90DG product if the registrant desires to label this formulation for use on passion fruit.



DETAILED CONSIDERATIONS

The Original Deficiency

"CBTS concludes that the above three labels are not consistent. The 24(c) label should be revised to allow a maximum of 5 applications per season, and 1.5 lbs ai/A in a minimum of 100 gal of water per acre."

<u>Crop diseases</u>	<u>Bravo® 720 Rate/Acre</u>	<u>Application Directions</u>
Alter-naria fruit & leaf rot	2 pts	Apply by ground 1.5 lb ai (= 2 pts Bravo® 720) in a minimum of 100 gal of water for adequate coverage of fruit and leaves. Begin treatments with disease appears and continue treatments at 14 day intervals until disease incidence drops or weather conditions no longer favor disease development. Do not apply more than 5 times per season and 7 days before harvest. Do not allow livestock to graze in treated area or feed treated plant parts to livestock.
Anthra-cnose		

The Petitioner's Response

The petitioner re-submitted the old proposed label of Bravo® 720 without any change and explanation.

CBTS's Conclusion

CBTS concludes that this deficiency is still outstanding.

OTHER CONSIDERATIONS

For the same use, the petitioner currently proposed two other formulations of chlorothalonil, Bravo® 500 and Bravo® 90DG, with

identical application instructions as for the old label of Bravo® 270, except the rates proposed for Bravo® 500 and Bravo® 90DG are 2 3/4 pts and 1.5 lb, respectively. The rates proposed for all three formulations correspond to 1.4 - 1.5 lb ai/A.

CBTS does not expect that significant difference in residue levels may result if the labels of both the Bravo® 270 and Bravo® 500 liquid formulations are revised as recommended above.

However, if the petitioner intends to include Bravo® 90DG under the same condition as for Bravo® 270, adequate residue data generated from the use of Bravo® 90DG on passion fruit grown in Florida reflecting the recommended label must be submitted. We have no residue data in our files reflecting side by side use of Bravo® 90DG and either Bravo® 270 or Bravo® 500.

cc: Circu, RF, PP#5E1569, W.T.Chin, PIB/FOD
RDI: P.V.Errico(6/24/92), R.Loranger(6/24/92)
H7509C: CBTS: CM#2, RM812, (703)305-5352, W.T.Chin,wc(6/24/92)