

Letter of May 15, 1987

Ms. Jackie DiMaggio
Chevron Chemical Co.
Post Office Box 4010
Richmond, CA 94804-0010

Dear Ms. DiMaggio,

This is in response to your May 14, 1987 phone call concerning labeling relevant to PR Notice 87-01. In the case where some but not all crops or sites on a label are to be chemigated, appropriate chemigation labeling would include the statement

"Apply this product only through irrigation systems. Do not apply this product through any other type of irrigation system." This generic statement would be followed by either: 1) a short list "Apply to corn only by irrigation systems. Apply to soybeans only by irrigation systems" and "Do not apply by chemigation to any other crop, or to these crops using any other type of irrigation system"; or 2) "See further restrictions on types of irrigation systems under labeling for each crop" and "Do not apply by chemigation to these crops using any other type of irrigation system." With option 2) each crop would have to include under a "Chemigation" heading "Apply to corn only by irrigation systems" or "Do not apply by Chemigation." My dear preference is to have all the chemigation information in one place under a "Chemigation" heading rather than having it spread out under each crop. Under option 1) a table may be acceptable listing crops and irrigation systems under a title such as "Apply by chemigation only to the following crops using only the following irrigation systems. Do not apply by chemigation to any other crop or to these crops using any other type of irrigation system."

corn - center pivot, lateral move
rice - flood, furrow
citrus - flood, solid set

If you have further questions in this regard please give me a call on (703) 557-1700.

Sincerely,

Thomas C. Ellwanger, Jr.,
Head Technical Support Section
Fungicide-Herbicide Branch Registration Division (TS-767C)