

MEMORANDUM May 21, 1987

SUBJECT: Decisions Relevant to PR Notice 87-01

TO: Branch Chiefs, Deputy Chiefs, Product Managers
and Section Heads Registration Division (TS-767C)

FROM: Thomas C. Ellwanger, Jr., Head
Technical Support Section

Fungicide-Herbicide Branch Registration Division (TS-767C)

The following decisions have been made in response to registrants' questions concerning PR 87-01. To be consistent throughout RD, similar questions should be answered using the following guidance. Any other questions should be referred to Tom Ellwanger 557-1700, room 241.

1. What labeling is appropriate for a product which has chemigation for some crops/sites but not all? See the attached letter to Chevron.
2. PR 87-01 is not applicable to nonagricultural uses. Some examples where 87-01 is not applicable included: A. 87-01 labeling would not be appropriate for the use of calcium hypochlorate used as a disinfectant in wells. B. products labeled only for non-crop area such as rights of way, industrial sights etc. C. 87-01 labeling would not be appropriate for acrolein applied to irrigation canals by irrigation district personnel. D. gaseous methyl bromide products.
3. Container labels must have either the prohibition, use directions or a referral statement.
4. What labeling is appropriate for registered but inactive products? Final printed labeling is not necessary, but typed label text is required.
5. What Sec. 24(c) labeling is acceptable? It is acceptable for 24(c) labeling to refer to Sec. 3 labeling for chemigation use directions. Such a reference should contain Sec. 3 product name and EPA Registration Number. If 24(c) chemigation is prohibited, the prohibition statement must be located on the 24(c) label.
6. If the prohibition statement is appropriate for a Sec. 3 label, it must be located within the directions for use section of the container label.