## Oil Use on Citrus

Date: May 15, 2006

To: Rick Melnicoe, Linda Herbst, et al.

From: Wilfred Burr

Subject: Fwd: Fw: Maximum User Rates for Citrus on Petro Canada's End Use Product Labels

## **Attachment**

Dear IPM Center folks,

I just received this attachment from Gregg Bentley, the CRM for the petroleum oils. In this letter from one of the registrants is a proposal to reduce the label rates of oil on citrus. They are asking if this change will cause undue hardship on any users out there. Please pass this around to the cirtus growers or experts and let EPA know if there are any problems with this change. Thanks in advance.

Wilfred

Wilfred Burr USDA/OPMP 1400 Independence Ave. SW Washington, DC 20250-0315 202-720-8647

We received this email and letter just before our move to Potomac Yards, and I had forgotten to forward it to you.

Our SRRD Division management has asked me to be sure and ask you to run this letter by your contacts in Texas and Florida, and most especially in California, to assure that this maximum rate reduction proposal by Petro-Canada does not negatively impact any growers.

Thanks, Wilfred.

Ben Gregg 703-308-8178

Robert Butz <butz@chemreg.com>
To: Bentley Gregg/DC/USEPA/US@EPA
04/27/2006 06:42 PM

cc: John Hebert/DC/USEPA/US@EPA

Subject: Maximun Usr Rates for Citrus on Petro Canada's End Use Product Labels

Ben,

Attached, as a Word file, is a letter from Michael Fefer of Petro Canada. Petro Canada will agree to a reduction in the maximum application rates for citrus.

Please call or email Michael or myself if you have any questions.

## **Bob Butz**

Robert Butz, Ph.D. ChemReg International 1990 Old Bridge Road, Suite 201 Lake Ridge, VA 22192

Phone: 703-492-0541 Fax: 703-492-0668

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(See attached file: 20060427 Oil max use rates ver 3.doc)

Petro-Canada Lubricants

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Via Email

April 27, 2006

Special Review and Reregistration Division (RED SRRD-3004) To: Office of Pesticide Programs (7508C) U.S. Environmental Protection Agency Room 108W11, Crystal Mall 2 1801 South Bell Street Arlington, VA 22202

Attn: Bentley Gregg

From: Dr Michael Fefer Petro Canada R&D 2489 North Sheridan Way Mississauga, Ontario L5K 1A8

Re: Maximum Use Rates for Petro Canada's end-use Products, EPA Reg. Nos. 69526-5, -6, -7, -8 and -9

Dear Ben,

The 4500 gal / acre referred to on our labels for citrus crop are "legacy" instructions.

My enquiries have shown that the highest volume used is 1500 gal / acre to treat citrus in California. Texas and Florida citrus growers use significantly lower amounts. The reason for this is due to a difference in the pest types in the two geographies.

As such we are prepared to amend all of our end-use labels and change the maximum application volumes from 4500 to 1500 gal / acre. This maximum rate translates to 22.5 gal of formulated product./ acre or 22.05 gal of a.i / acre based on the fact that the formulated products are 98%a.i. This volume equals 158.76 lbs.a..i./ acre based on a density of 7.2 lbs./ gal.

Please call or email me if you have any questions.

Cc: John Hebert