COOPERATIVE EXTENSION
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November 21, 1983

Richard Schmidt, TS 769C
Residue Chemist
Environmental Protection Agency
401 M St., SW
Washington, D. C. 20250

Re: Use of pesticides on alfalfa grown for seed

Dear Dick:

This is to confirm our telephone conversation of November 17 regarding clearances for pesticides with directions for use on alfalfa grown for seed. I understand EPA will interpret existing tolerances for alfalfa to apply equally to alfalfa sprouts. You would normally expect residues on sprouts resulting from a particular pattern of use to be well within the level remaining on alfalfa from the same pattern of use. This premise seems very safe. We have conducted several IR-4 projects involving residue determinations on seed, sprouts, chaff and green regrowth. In no case were residues detectable in sprouts.

I further understand that you would not normally require additional residue data for alfalfa sprouts if tolerances are in effect for alfalfa. You pointed out that in some cases, the toxicologist may take exception to residues on sprouts at the tolerance level if tolerances are high. This is understandable if they consider that residues on sprouts would be at the tolerance level. This should never happen under good use practices.

Some clarification is needed with respect to applying existing tolerances to sprouts. Would the tolerances for alfalfa hay be applicable as well as the tolerances for fresh or green alfalfa? In some cases the only tolerance is for hay.

Dick, I would appreciate a written confirmation of your position on this subject.

Sincerely yours,

Harold G. Alford
Regional Coordinator

HGA:wg

cc: Drew Baker

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