

US EPA ARCHIVE DOCUMENT



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

4MSJ/LS

7/19/89

JUL 19 1989

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

Memorandum

Subject: WA-890019. 24(C) Special Local Needs Registration
for Use of Naled on Alfalfa Grown for Seed.
No Accession Number / No MRID Number
DEB #5529

From: Michael S. Metzger, Chemist *Michael S. Metzger*
Dietary Exposure Branch
Health Effects Division (H7509C)

Thru: Francis B. Suhre, Acting Section Head, SRS 2 *Francis B. Suhre*
Dietary Exposure Branch
Health Effects Division (H7509C)

To: William H. Miller, PM 16 Team
Registration Division (H7505C)

The State of Washington has issued a Section 24(C) Special Local Needs Registration authorizing the use of naled (Dibrom^R 8 Emulsive, EPA Reg. No. 239-1281-59639) on alfalfa grown for seed use only. Dibrom^R 8 Emulsive contains 58% naled by weight (7.2 lbs. a.i./gal). Naled will be used to control lygus bugs and thrips. The Washington State Department of Agriculture (WSDA) considers use of pesticides on alfalfa grown for seed only, a non-food / non-feed use.

Tolerances are established for residues of naled (1,2-dibromo-2,2-dichloroethyl dimethyl phosphate), and its conversion product 2,2-dichlorovinyl dimethyl phosphate, on all raw agricultural commodities ranging from 0.05 ppm in meat, milk and eggs, to 10 ppm on forage grasses and forage legumes; and include a tolerance of 0.5 ppm for residues in or on all raw agricultural commodities not specifically listed (40 CFR 180.215; 180.3(e)(5)). A Registration Standard has been completed for naled (Residue Chemistry Chapter, 10/25/82).

The proposed use calls for a maximum of 3 applications/cutting at 7-day intervals at 1/2 - 1 pint product (0.45-0.9 lbs.a.i.)/A/application. The following restriction appear on the 24(C) label:

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OPP Pocket

Do not use treated seed or crop parts for food, feed or oil purposes. Do not graze treated alfalfa. Treated alfalfa is not to be used for sprouting.

All seed alfalfa treated with Dibrom^R is to be tagged at the conditioning plant "not for human or animal consumption".

All alfalfa seed screenings shall be disposed of in such a way that they cannot be distributed or used for food or feed.

The WSDA has issued "Rules Related to Use of Pesticides on Seed Alfalfa" to insure compliance with the above restrictions (included as an attachment to this review). As long as this policy is adhered to, we have no objections to this 24(C) registration.

Conclusions and Recommendations

OPP has determined that the program set up by the WSDA will prevent diversion of the treated crop to food or feed uses. Therefore, DEB has no objections to this 24(C) registration.

Attachment

cc with attachment: M.Metzger (DEB), non-food use file, naled SF, naled Reg. Std. File, E. Eldredge (PMSD/ISB), Circu (7), RF
RDI:F.B.Suhre:FBS:7/18/89:REZ:7/18/89
H7509C:DEB:M.Metzger:MM:Rm803a:CM#2:7/18/89

FOR DISTRIBUTION AND USE ONLY IN THE STATE OF WASHINGTON

DIBROM® 8 Emulsive

EPA Reg. No. 239-1281-59639

EPA SLN No. WA-890019

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Do not apply this product through any type of irrigation system.

ALFALFA GROWN FOR SEED ONLY

Lygus: Apply 1 pt. per acre on 7 day interval.

Thrips: Apply 1/2 pt. per acre. Apply in 10 - 20 gals. if sprayed by ground equipment or in 3 - 5 gals. if sprayed by air. Do not exceed 3 applications per cutting.

Do not use treated seed or crop parts for food, feed or oil purposes. Do not graze treated alfalfa. Treated alfalfa is not to be used for sprouting.

All seed alfalfa treated with Dibrom is to be tagged at the conditioning plant "Not for human or animal consumption."

All alfalfa seed screenings shall be disposed of in such a way that they can not be distributed or used for food or feed.

Do not expose bees to direct Dibrom application. Do not expose bees to treated crop for 12 hours after treatment.

* * * * *

All applicable directions, restrictions, and precautions on the EPA registered label are to be followed.

This labeling must be in the possession of the user at the time of pesticide application.

24(c) Registrant

Valent U.S.A. Corporation
P.O. Box 8025
Walnut Creek, CA 94564-8025

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Do not use treated seed or crop parts for food, feed or oil purposes. Do not graze treated alfalfa. Treated alfalfa is not to be used for sprouting.

All seed alfalfa treated with Dibrom is to be tagged at the conditioning plant "Not for human or animal consumption."

All alfalfa seed screenings shall be disposed of in such a way that they can not be distributed or used for food or feed.

Do not expose bees to direct Dibrom application. Do not expose bees to treated crop for 12 hours after treatment.

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24(c) Registrant

Valent U.S.A. Corporation
P.O. Box 8025
Walnut Creek, CA 94564-8025

11/3/89 MB

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United States Environmental Protection Agency
Office of Pesticide Programs
Washington, DC 20460



Data Review Record

Confidential Business Information - Does not contain
National Security Information (E.O. 12065)

Pack Number
9-1738

Date Received
7/11/89

Product Name
Dibrom 8 Emulsion

Chemical Name
naled

2. Identifying Number	3. Record Number	4. Action Code	5. MRID/ Accession Number	6. Study Guideline or Narrative
VA-890019	247729	585		

Reference No.	8. Date Rec'd (EPA)	9. Prod/Review Mgr/DCI	10. PM/RM Team No.	11. Date to HED/EFED/RD/BEAD	12. Proj Return Date	13. Date Returned to RD/SRFD
	6/27/89	Miller	16	7/11/89	8/12/89	

Instructions
State has issued this use on alfalfa seed crop as a non-food, non-feed use. Do you agree that the use qualifies as non-food/non-feed? Refer to attached copy of Ackerman's 2/4/88 ltr. to the State.
 DEB# 5529

This Section Applies to Review of Studies Only

4. Check Applicable Box

<input type="checkbox"/> Adverse 6(a)(2) Data (405)	<input type="checkbox"/> Generic Data (Reregistration) (660)	15. No. of Individual Studies Submitted
<input type="checkbox"/> Special Review Data (870)	<input type="checkbox"/> Product Specific Data (Reregistration) (855)	

5. Have any of the above studies (in whole or in part) been previously submitted for review?

Yes (Please identify the study(ies)) No

17. Related Actions

18.	To	Type of Review	19. Reviews Also Sent to	20. Data Review Criteria
HED	X	Science Analysis & Coordination	SAC <input type="checkbox"/> PC <input type="checkbox"/>	A. Policy Note No. 31 <input type="checkbox"/> 1 = data which meet 6(a)(2) or meet 3(c)(2)(B) flagging criteria <input type="checkbox"/> 2 = data of particular concern from registration standard <input type="checkbox"/> 3 = data necessary to determine tiered testing requirements B. Section 18 <input type="checkbox"/> 1 = data in support of section 3 in lieu of section 18 C. Inert Ingredients <input type="checkbox"/> 1 = data in support of continued use of List 1 inert
		Toxicology/HFA	TOX/HFA <input type="checkbox"/> PL <input type="checkbox"/>	
		Toxicology/IR	TOX/IR <input type="checkbox"/>	
		Dietary Exposure	DEB <input type="checkbox"/> EA <input type="checkbox"/>	
EFED		Nondietary Exposure	NDE <input type="checkbox"/> AC <input type="checkbox"/>	
		Ecological Effects	EEB <input type="checkbox"/> BA <input type="checkbox"/>	
SRFD		Environmental Fate & Groundwater	EFGWB <input type="checkbox"/>	
		Special Review	SR <input type="checkbox"/>	
RD		Reregistration	RER <input type="checkbox"/>	
		Generic Chemical Support	GSC <input type="checkbox"/>	
		Insecticide-Rodenticide	IR <input type="checkbox"/>	
		Fungicide-Herbicide	FH <input type="checkbox"/>	
BEAD		Antimicrobial	AM <input type="checkbox"/>	
		Product Chemistry		
		Precautionary Labeling		
		Economic Analysis		
		Analytical Chemistry		
		Biological Analysis		

Confidential Statement of Formula (EPA Form 8570-4) Attached (Trade Secrets) Label Attached

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7/25/89
off lock



Data Review Record

Confidential Business Information - Does not contain
National Security Information (E.O. 12065)

Pack Number 9-1738	Date Received 7/11/89
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Product Name <i>Dibrom 8 Emulsion</i>	Chemical Name <i>naled</i>
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2. Identifying Number	3. Record Number	4. Action Code	5. MRID/Accession Number	6. Study Guideline or Narrative
VA-890019	247729	585		

Reference No.	8. Date Rec'd (EPA) 6/27/89	9. Prod/Review Mgr/DCI Miller	10. PM/RM Team No. 16	11. Date to HED/EFED/RD/BEAD 7/11/89	12. Proj Return Date 8/12/89	13. Date Returned to RD/SFRD
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Instructions
State has raised this use on alfalfa seed crop as a non-food, non-feed use. Do you agree that the use qualifies as non-food/non-feed? Refer to attached copy of Ackerman's 2/4/88 ltr. to the State.

DEB# *5529*

This Section Applies to Review of Studies Only

4. Check Applicable Box <input type="checkbox"/> Adverse 6(a)(2) Data (405) <input type="checkbox"/> Special Review Data (870) <input type="checkbox"/> Generic Data (Reregistration) (660) <input type="checkbox"/> Product Specific Data (Reregistration) (955)	15. No. of Individual Studies Submitted
8. Have any of the above studies: (in whole or in part) been previously submitted for review? <input type="checkbox"/> Yes (Please identify the study(ies)) <input type="checkbox"/> No	17. Related Actions

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	Toxicology/HFA	TOX/HFA <input type="checkbox"/> PL <input type="checkbox"/>	
	Toxicology/IR	TOX/IR <input type="checkbox"/>	
	<input checked="" type="checkbox"/> Dietary Exposure	DEB <input type="checkbox"/> EA <input type="checkbox"/>	
	<input type="checkbox"/> Nondietary Exposure	NDE <input type="checkbox"/> AC <input type="checkbox"/> BA <input type="checkbox"/>	
EFED	Ecological Effects	EEB <input type="checkbox"/>	B. Section 18 <input type="checkbox"/> 1 = data in support of section 3 in lieu of section 18 C. Inert Ingredients <input type="checkbox"/> 1 = data in support of continued use of List 1 inert
	Environmental Fate & Groundwater	EFGWB <input type="checkbox"/>	
SFRD	Special Review	SR <input type="checkbox"/>	
	Reregistration	RER <input type="checkbox"/>	
	Generic Chemical Support	GSC <input type="checkbox"/>	
RD	Insecticide-Rodenticide	IR <input type="checkbox"/>	
	Fungicide-Herbicide	FH <input type="checkbox"/>	
	Antimicrobial	AM <input type="checkbox"/>	
	Product Chemistry		
BEAD	Precautionary Labeling		
	Economic Analysis		
	Analytical Chemistry		
	Biological Analysis		

<input type="checkbox"/> Confidential Statement of Formula (EPA Form 8570-4) Attached (Trade Secrets)	<input type="checkbox"/> Label Attached
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