US EPA ARCHIVE DOCUMENT

CASWELL FILE
8-2-92

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

AUG 0 2 1992

OFFICE OF
PESTICIDES AND TOXIC
SUBSTANCES

MEMORANDUM

SUBJECT: Naled---Section 18 Emergency Exemption/Swiss Chard
ID #92CA0028

Chemical: 586 (034401)
RD Record: S-419109
HED Proj.: D179171

FROM: Irving Mauer, Ph.D., Geneticist
Toxicology Branch-I
Health Effects Division (H7509C)

07-17-92
Karl V. Ritche 7/29/92

TO: Rebecca Cool/Susan Stanton PM #41
Registration Support Branch
Registration Division (H7505C)
-and-
Stephen Funk
Chemical Branch
Reregistration Support (H7509C)

REQUEST: Under cover of May 20, 1992, California's Department of Pesticide Regulation (CDPR) requests a specific exemption under FIFRA Section 18 to use naled (as Valent's DIBROM 8 Emulsive 58% a.i., EPA Reg. 59639-15-AA) on all of the state's 1992 acreage (approx. 60 A, mainly in the San Joaquin, Imperial and coastal valleys) of Swiss chard through February 28, 1993, to control both green peach aphid (Myzus persicae) and black bean aphid (Aphis fabae) infestations. It is proposed to use multiple applications with ground equipment at a maximum rate of 1.35 lb a.i./A, to be repeated ".... as necessary to maintain control," with 24 hour as a PHI, as well as a worker safety re-entry interval. It is stipulated here that the total crop of Swiss chard for the fresh market; livestock are not to be fed the r.a.c. or its by-products, and further, a grazing restriction is to be imposed on treated acreage.

REQUESTER DOCUMENTATION

According to CDPR's application, both species of aphids are vigorous and tenacious pests, only minimally controlled by alternative pesticides (such as carbaryl, diazinon, permethrin, B. thuringiensis, malathion, methomyl, and dimethoate), in

Printed on Recycled Paper

contrast to the effectiveness of naled (together with the latter's desirable one-day preharvest interval). In the absence of permission to use naled, the Department anticipates this year's crop losses of 50% or more, accompanied by "vastly" increased costs of production, as well as decreased marketability of the remainder.

In support of this request, the following attachments were submitted:

(A) Section 18 Label, detailing the proposed program, and containing directions for use, precautions and restrictions.

(B) Letters from Buyers, complaining of aphid infestation of the 1991 crop, when naled was not available for this use.

(C) USEPA Letter Invalidating the SLN issued in 1991 by the State of California Department of Food and Agriculture (CDFA) under FIFRA Section 24(c) for the use of naled on Swiss chard for the control of aphids, loopers, army worms, caterpillars and leafminers.

(D) University of California Cooperative Extension Letter, supporting the use of naled for aphid control.

(E) Letter for Louis Boer, Jr., pest control advisor to Ripon Farm Service, extolling the advantages of naled over diazinon.

(F) (State of California) Fish and Wildlife Review, dated February 14, 1992, recommending use of naled for this purpose under FIFRA Section 18.

TB CONCLUSIONS: Tox Branch recommends granting this specific exemption, since under the conditions for the use of naled as stated in the CDR'S request, there are no toxicological concerns (see companion recommendation from HED/CBRS, dated 06/24/92).