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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: PP#6E3347, Diazinon in/on Ginseng-Revised
Section B, Submission of June 10, 1986,
(no Accession Number, RCB No. 1116).

FROM: E.T. Haeberer, Chemist *E.T. Haeberer*
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

THRU: Robert S. Quick, Section Head *RSQ*
Tolerance Pesticide Section I
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

TO: Hoyt Jamerson, PM-43
Emergency Response and Minor Use Section
Registration Division (TS-767C)

and

Toxicology Branch
Hazard Evaluation Division (TS-769)

In response to the deficiencies cited in our memo of April 1, 1986 (PP#6E3347, E.T. Haeberer), IR-4 has submitted a revised Section B. The deficiencies are listed below, followed by the revised proposal for Section B.

- 3a. No residue data have been submitted reflecting the proposed use of Diazinon on ginseng.
- 3b. The petitioner requests that a tolerance of 0.75 ppm be extended to ginseng, stating the use would be similar to that for other root crops with established tolerances. RCB disagrees with this supposition for the following reasons:

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- (1) Ginseng requires five to seven years to grow to maturity as compared to one season for the comparative root crops.
 - (2) There are no residue data which reflect multiple applications of Diazinon on a root crop at the proposed preharvest interval (PHI). There are insufficient data for the purpose of extrapolation.
- 3c. For the reasons cited above, we can draw no conclusions concerning the adequacy of the requested tolerance for the proposed multiple application use. Additional residue data are needed which reflect the maximum proposed use pattern and appropriate PHI.
- 3d. We could recommend in favor of the requested tolerance if the proposed use was changed to one application per year. The petitioner would have to submit a revised Section B with the appropriate changes.
- 4c. Section B should be amended to restrict use of ginseng plant tops as either an agricultural commodity or forage, fodder, or feed.

Revised Section B

GINSENG

FOLIAR APPLICATION

For control of leafhoppers, aphids, lygus bugs, flea beetles, and jumping plant lice; spray 3/4 to 1 pt. per acre when insects first appear. For heavy insect infestations, use 1 pt. per acre. Apply by ground equipment using 10 to 100 gallons of water per acre. Do not apply more than one application per growing season. Do not apply during flowering of three or four year old crops. Do not apply within 30 days of harvest. Do not graze treated areas of feed treated forage to livestock.

The deficiencies cited in our memo of April 1, 1986 are now resolved.

Recommendation:

TOX considerations permitting, RCB recommends in favor of establishment of the proposed 0.75 ppm tolerance for 0,0-diethyl 0-(2-isopropyl-6-methyl-4-pyrimidinyl) phosphorothioate in/on the r.a.c ginseng.

An International Residue Limit Status sheet was attached to our previous review.

cc:RF, Circu, EHaeberer, TOX, EAB, EEB, PP#6E3347, FDA, PMSD/ISB,
FBoyd

RDI:RSQuick:7/3/86:RDSchmitt:7/7/86

TS-769:RCB:CM#2:RM810:X7484:EHaeberer:wh:7/10/86