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

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1748

OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

AUG 12 1987

MEMORANDUM

SUBJECT: PP#6E3425. Phosmet (Imidan®) on Pistachio.  
A Revised Section B. Amendments of May 20 and  
July 14, 1987. No MIRD Number. RCB #2505 &  
2602.

FROM : Sami Malak, Ph.D., Chemist *Sami Malak*  
Tolerance Petition Section III  
Residue Chemistry Branch  
Hazard Evaluation Division (TS-769)

TO : Hoyt L. Jamerson, PM #43  
Emergency Response and Minor Use Section  
Registration Support and Emergency Response Branch  
Registration Division (TS-767)

and  
Toxicology Branch  
Hazard Evaluation Division (TS-769)

THRU : P. V. Errico, Section Head *P. V. Errico*  
Tolerance Petition Section III  
Residue Chemistry Branch  
Hazard Evaluation Division (TS-769)

The petitioner, IR-4, on behalf of the IR-4 National Director, Dr. R. H. Kupelian, and the Agricultural Experiment Station of California, submitted two revised Sectons B in response to our memo of 4/10/87 (S. Malak, PP#6E3425). Each deficiency is listed first followed by the petitioner's response and our comments.

Deficiency # 3(a)

Additional data are needed to support the proposed concentrated sprays on pistachio. Alternatively, the

petitioner is requested to revise Section B by deleting all references to the proposed concentrated sprays on pistachio and limit the rate to a maximum of 4 lb act/A in a minimum of 300 gallons of spray solution and use be limited to a dormant spray at the proposed rate and one foliar spray application at a maximum of 4 lb act/A/season and a 14-day PHI.

Petitioner's Response

The petitioner responded with a revised section B in which all references to the previously proposed concentrated sprays on pistachio were deleted. In addition, the dilute spray directions were revised to reflect a minimum of 300 gallons of spray solution/A and the dosage was limited to 4 lb act/A/season. Furthermore, the PHI was set at 14 days.

RCB's Comments

The petitioner complied with this revision to Section B as directed in our memo of 4/16/87.

This resolves deficiency 3(a).

Deficiency 3(c)

The proposed grazing restriction should be revised to read: "Do not allow livestock to graze in treated areas or feed on cover crops from treated pistachio groves."

Petitioner's response

The petitioner responded by submitting a revised Section B in which the grazing restriction now reads "Do not allow livestock to graze on treated areas or feed on cover crop of treated pistachio groves."

RCB's Comments

The petitioner complied with our request by changing the grazing restriction as directed.

Deficiency 3(c) is resolved.

Conclusions and recommendation

Deficiencies 3(a) and 3(c) of subject petition (S. Malak, 4/16/87) have been resolved.

TOX and EAB considerations permitting, RCB recommends for establishment of the requested permanent tolerance of 0.1 ppm for residues of phosmet, a cholinesterase inhibiting insecticide N-(mercaptomethyl)phthalimide S-(O,O-dimethylphosphorodithioate) and its oxygen analog N-(mercaptomethyl)phthalimide S-(O,O-dimethylphosphorothioate) in or on the raw agricultural commodity pistachio grown in California only.

cc: RF, Circu, S. Malak, SF (phosmet or Imidan),  
PP#6E3425, TOX, EAB, RD (PM #43), and PMSD/ISB.

RDI: P.V. Errico: 8/10/87: R. D. Schmitt: 8/10/87.  
TS-769C:RCB:CM#2:RM814A:S.Malak:X557-4379:7/13/87,  
Revised 7/30/87.