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

PM50/ISB

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AUG 27 1987

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: PP#7E3495. Methomyl on Imported Hops. Amendment of August 13, 1987. No MIRD of RCB Numbers.

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

THRU: Charles L. Trichilo, Ph.D., Chief
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

TO: Dennis Edwards, PM #12
Insecticide/Rodenticide Branch
Registration Division (TS-767)

and

Toxicology Branch
Hazard Evaluation Division (TS-769)

This is to address Du Pont's letter of 8/13/87 concerning reconsideration of the original proposal of 4 ppm tolerance for residues of methomyl in/on imported hops in lieu of RCB's recommendation of 7 ppm. The letter stated that the recommended 7 ppm is based on an incorrect interpretation of the residue data since the reviewer considered the data to represent residues from 6 fresh and 2 dry samples, whereas all 8 samples are from dried hops.

We have reviewed the original data submitted under MIRD No. 400569-01. Page 4 is a summary of the data as presented in tables on pages 5-10. In the summary on page 4, several statements were made, describing sample

analyses and residue levels, to the effect that both fresh and dried samples are involved. This was re-enforced from the following statement appearing in the last paragraph of page 4: "Residue considerations on hops treated with methomyl, harvested, and dried were similar to those on fresh hops." For this reason, the reviewer considered that data presented on pages 6-8 were fresh samples. The data on page 10 was specifically identified as being dried. The remaining six samples listed in pages 6-8 were not identified as being fresh or dried. It was then the reviewer's interpretation that these six samples are fresh as has been stated in the summary sheet. The raw data were not included, nor were any other information to guide the reviewer as to the nature of the six samples presented in pages 6-8. Pages 5 and 9 presented recovery data.

For further consideration of the proposed tolerance, and to clear up this confusion, the petitioner should submit the raw residue data. Furthermore, the petitioner should submit a revised Section F proposing appropriate food additive tolerance for residues of methomyl in or on dried hops and a feed additive tolerance in or on spent hops, since no 408 tolerances will be established for the raw agricultural commodity, hops, as a result of the proposed use in the Federal Republic of Germany.

cc: RF, SF, Circu, (methomyl or Lannate®), PP#7E3495, S. Malak, James Akerman (RD), D. Edwards (RD), TOX, and PMSD/ISB.

RDI: P.V.Errico:8/25/87:R.D.Schmitt:8/26/87
TS-769:RCB/HED:CM#2:RM:814A:S.Malak:X557-4379:8/24/87