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

MAR 19 1982

MEMORANDUM

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

SUBJECT: Proposed Permethrin Tolerances on Several Raw
Agricultural Commodities.

FROM: John H. Onley, Ph.D., Chemist *John H. Onley*
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Hazard Evaluation Division (TS-769)

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

TO: Franklin D.R. Gee, Product Manager No. 17
Registration Division (TS-767)

and

Toxicology Branch
Hazard Evaluation Division (TS-769)

This memorandum is forwarded as a consequence of the permethrin meeting that was held on March 11, 1982. Unfortunately, before entering this meeting, the members of Residue Chemistry Branch were unaware of the agenda's content. Therefore, this memorandum serves formally as RCB's answers to those questions relating to the establishment of tolerances on the several raw agricultural commodities that were mentioned at the subject meeting.

The meeting had the following participants:

Doug Camp	-	Registration Division
Robert Brown	-	" "
Frank Sanders	-	" "
Franklin Gee	-	" "
John Malone	-	Hazard Evaluation Division
Charles Trichilo	-	Residue Chemistry Branch (HED)
John Onley	-	Residue Chemistry Branch (HED)

In brief, Registration Division informed us at the subject meeting that by/on Tuesday, March 16, 1982, draft orders will be drawn up on several agricultural commodities and asked if draft orders could be written up for the establishment of tolerances on the following commodities:

lettuce
cabbage
alfalfa
brussels sprouts
tomatoes
corn (field)
sweet corn
broccoli

Residue Chemistry Branch pointed out the lack of residue data reflecting geographical representation on alfalfa and lettuce. However, Mr. Campt indicated that Mr. Edwin Johnson, Director of the Office of Pesticides, would allow for the proposed usages of permethrin on these commodities in those states specified on the label. RCB also pointed out the problems of arriving at the adequacies of permethrin tolerances involving meat, milk, poultry and eggs commodities. In fact, a March 15, 1982 meeting with ICI and FMC had already been arranged so that these problems may be resolved; this date is only one day before the March 16, 1982 dead line date for writing up the concerned draft orders.

However, in view of the preceding and in view that we have just recently received a favorable oral report (March 5, 1982) on the the metabolites methodology from the Method Trial Unit of BFSB, RCB indicated that tolerances could be established on the above commodities but many Section B's (labeling) and F's will need to be revised; the meeting with FMC and ICI on March 15, 1982 should resolve some of the Section F's problems, but not all. Registration Division indicated that the required Section B's (label changes) and Section F's changes would be made (presumably with some cooperation from the Petitioners, FMC and ICI) so that the aforementioned draft orders would be feasible.

A List of Proposed Permethrin Tolerances

As agreed at the 3/11/82 meeting, RCB has compiled below a list of permethrin tolerance relating to the above commodities; some are adequate as is; some will require label changes (Section B) and/or revised Section F's as aforementioned above:

<u>Commodity</u>	<u>#Petition Identity</u>	<u>Proposed Tolerance</u>	<u>Adequate Tolerances for Draft order</u>
*Revised Sections F should be submitted so that there is conformity between the <u>proposed</u> and <u>adequate</u> tolerances for the draft orders. RCB defers to the discretion of RD as to when these revised Section F's should be submitted. Required Section B revisions are under the "Petition Identity" column#.			
Tomatoes, fresh	9F2243/9H5234 (FMC)	1.5*	2
	8F2099/8H5190 (ICI) Needs label restriction on small tomatoes (less than 1" in diameter).	2	2
Tomato pomace	9F2243/9H5234 (FMC)	230*	185
	8F2099/8H5190 (ICI)	185	185
Celery	8F2099/8H5190 (FMC)	5	5
	9F2192/9H5212 (ICI)	3*	5
Lettuce	9F2243/9H5234 (FMC) Inadequate data unless geographical label restrictions are applied (see the beginning of this memo).	20	20
	9F2192/9H5212 (ICI) Inadequate data unless geographical label restrictions are applied (see the beginning of this memo).	1*	20
Cabbage	9F2192/9H5212 (ICI)	1*	6
	1F2562/1H5319 (FMC) Label should reflect ground application; Section B needs to be revised.	6	6

Alfalfa, fresh	OF2308 (ICI) Inadequate data unless geographical label restrictions are applied.	4*	20
	OF2389 (FMC) Inadequate data unless geographical label restrictions are applied.	20	20
Alfalfa, hay	OF2308 (ICI) Inadequate data unless geographical label restrictions are applied.	16*	65
	OF2389 (FMC) Inadequate data unless geographical label restrictions are applied.	65	65
Brussels sprouts	9F2207/9H5219	1	1
Corn, grain (including field and pop)	1F2476 (FMC)	0.05	0.1
Corn, grain (including field and pop)	2F2624 (ICI)	0.1	0.1
Corn, fodder (including field and pop)	1F2476 (FMC)	12	12
Corn, fodder (including field field and pop)	2F2624 (ICI)	None submitted	--
Corn forage (including field and pop)	1F2476 (FMC)	12	12
Corn, forage (including field and pop)	2F2624 (ICI)	None submitted	--
Corn, sweet (K+CWHR)	9F2207/9H5219	0.1	0.1

Corn, sweet, forage	9F2207/9H5219 (ICI) (See review of Amendment 8/14/81)	Originally proposed 115 ppm	?
Corn, sweet, fodder	9F2207/9H5219 (ICI)	Originally proposed	?

Originally the petitioner proposed a tolerance of 115 ppm on each commodity. Later a tolerance of 30 ppm on these commodities was proposed after a drying study was done. We asked the Petitioner to provide the ppm residue level on the green stover used in the drying study; we did not receive an answer. Therefore, we have no further basis for lowering the tolerance from 115 ppm on corn fodder.

Corn oil	2F2624 (ICI)	1	?
	1F2476 (FMC)	None submitted	--
Corn soapstock	2F2624 (ICI)	1	?
	1F2476 (FMC)	None submitted	--
Apples	9F2247/9H5235 (ICI) Revised Section B should be submitted. Submitted data support ground application only. There is a need for a restriction against the grazing and feeding of treated cover crops.	2.5*	3
	1F2562/1H5219 (FMC) Revised Section B should be submitted; rates should be expressed as lbs. a.i./100 gals.	2*	3
Apple pomace	9F2247/9H5235 (ICI) (See comments above).	65	65
	1F2562/1H5219 (FMC) (See comments above).	17*	65

Meat, Milk, Poultry and Eggs Tolerances

- (1. ICI Petitions Nos. 8F2099/FAP#8H5190, 9F2192/FAP#9H5212, 9F2207/9H5219 and 1F2564 are involved.
- (2. FMC Petitions Nos. OF2389, 9F2196/FAP #9H5215, and (9F2243/FAP #9H5234 are involved.

<u>Product</u>	<u>Proposed Tolerance, ppm</u>		<u>Adequate Tolerances for Draft Orders</u>
	<u>FMC</u>	<u>ICI</u>	
Cattle, fat	4.0	2.0	5.0
Cattle, mbyp	3.0	0.2	3.0
Cattle, meat	1.0	0.2	1.0
Hogs, fat	4.0	2.0	5.0
Hogs, mbyp	3.0	2.0	4.0
Hogs, meat	1.0	0.2	1.0
Goats, fat	4.0	2.0	5.0
Goats, mbyp	3.0	0.2	3.0
Goats, meat	1.0	0.2	1.0
Horses, fat	4.0	2.0	4.0
Horses, mbyp	3.0	0.2	3.0
Horses, meat	1.0	0.2	1.0
Sheep, fat	4.0	2.0	5.0
Sheep, mbyp	3.0	0.2	3.0
Sheep, meat	1.0	0.2	1.0
Poultry, fat	1.0	---	1.0
Poultry, mbyp	1.0	---	1.0
Poultry, Meat	0.2	0.1	0.2
Milk (whole)	0.5	0.1	0.5
Eggs	1.0	0.05	0.1

12.5 ppm on milk fat reflecting 0.5 ppm in whole milk.