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

PMSD/ISB

0442

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OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: PP#5F3271 (RCB# 437). Permethrin on Cherries and Plums.
Amendment of December 17, 1985 (No Accession No.).

FROM: Nancy Dodd, Chemist *Nancy Dodd*
Tolerance Petition Section II
Residue Chemistry Branch
Hazard Evaluation Division (TS-769C)

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

TO: George LaRocca, Product Manager #15
Insecticide-Rodenticide Branch
Registration Division (TS-767C)

and

Toxicology Branch
Hazard Evaluation Division (TS-769C)

The petitioner, FMC Corporation, has submitted an amendment dated December 17, 1985 in response to deficiencies and comments contained in RCB's August 14, 1985 review of PP#5F3271. This amendment consists of a letter from Robert Stewart of FMC Corporation to George LaRocca of Registration Division, a revised label for Pounce 3.2 EC, and a revised Section F.

Deficiencies and comments listed in the August 14, 1985 review are given below followed by the petitioner's responses and RCB's conclusions:

Deficiency #1a

A revised Section B should be submitted wherein the label contains both a restriction against grazing treated orchards and a restriction against cutting cover crops for feed.

Petitioner's Response to Deficiency #1a

The petitioner has added the following statement to the Pounce 3.2 EC label under "Cherries" and "Plums":

"Do not graze livestock or feed crop forage from treated orchards."

RCB's Conclusion #1a

Deficiency #1a is resolved.

Deficiency #1b

A revised Section B should be submitted wherein the label specifies a line of division such as "east of the Mississippi" and "west of the Mississippi" instead of "east" and "west." The terms "eastern" and "western" United States are too general.

Petitioner's Response to Deficiency #1b

The petitioner has replaced the terms "eastern" and "western" with "east of the Rockies" and "west of the Rockies."

RCB's Conclusion #1b

Deficiency #1b is resolved.

Deficiency #7

Residue data for dried prunes processed from fresh fruit bearing residues at or near the proposed tolerance are needed. If there is a concentration of residues in dried prunes, then the petitioner will need to submit a proposal for an appropriate food additive tolerance.

Petitioner's Response to Deficiency #7

Prunes, both for fresh market and processing, are removed from the label. The statement "Do not apply to prunes" is added to the plum label.

RCB's Discussion #7

Plums can be dried after removal of the pit and are then called "dried plum." The "fresh prune" which is now grown in the Pacific Northwest is also referred to as "purple plum." This "purple plum" can be used fresh or dried (see D. Considine and G. Considine, "Plum and Prune," Foods and Food Production

Encyclopedia, pp. 1508-1513, New York, NY, 1982). Thus, it is the Agency's policy not to accept label restrictions for fresh plums only.

"Prune" is listed as the processed commodity of plum in "Pesticide Assessment Guidelines," Subdivision O, Residue Chemistry, October 1982.

Tolerances now being granted for plums are referred to in the Federal Register as "plums (fresh prunes)."

RCB's Conclusion #7

The petitioner should submit residue data for dried plums or prunes as previously requested.

This deficiency is not resolved.

Comment #9

An International Residue Limit Status Sheet is attached to this review. A Codex IRL has been proposed for permethrin on stone fruit at 2 mg/kg. A Canadian tolerance has been established for permethrin on plums at 0.5 part per million (ppm). No Mexican tolerances have been established for permethrin on plums or cherries. Thus, the Codex proposal and Canadian tolerance are not compatible with the proposed U.S. tolerances on cherries and plums with respect to the tolerance expression and tolerance levels. Concerning the residue level for plums, RCB would have no objection to raising the level from the proposed 1.0 ppm level to 2 ppm, if toxicologically feasible, in order to coincide with the Codex proposal of a 2 mg/kg level on stone fruit.

Petitioner's Response

The petitioner has submitted a revised Section F increasing the tolerance for plums to 2.0 ppm.

RCB's Conclusion #9

RCB has no objection to this change.

Other Considerations

An International Residue Limit Status Sheet is attached to this review. A Codex IRL has been proposed for permethrin on stone fruit at 2 mg/kg. A Canadian tolerance has been established for permethrin on plums at 0.5 ppm. No Mexican

tolerances have been established for permethrin on plums or cherries.

The Codex proposal for stone fruit at 2.0 ppm is now numerically equivalent to the 2.0 ppm U.S. tolerance proposal for plums. The Codex tolerance expression, however, includes parent only; the U.S. tolerance expression includes parent and its metabolites DCVA and (3-phenoxyphenyl)methanol. The Canadian tolerance on plums is not numerically compatible with Codex or the U.S. tolerance proposal; the Canadian tolerance on plums includes parent only.

The Codex proposal and Canadian tolerance are not compatible with the proposed U.S. tolerance on cherries with respect to the tolerance expression and tolerance levels.

Recommendation

RCB recommends against the proposed tolerances for permethrin and its metabolites dichlorovinyl acid (DCVA) and m-phenoxybenzyl alcohol (3-PBA) on cherries at 3.0 ppm and on plums at 2.0 ppm for reasons given in conclusion #7 above.

Attachment: International Residue Limit Status Sheet

cc: R.F., Circu, Reviewer-N.Dodd, EAB, EEB, PMSD/ISB-Eldredge,
FDA, PP#5F3271

RDI:J.H.Onley: 2/13/86: R.D.Schmitt: 2/14/86

TS-769:RCB:CM#2:RM810:X1681:N.Dodd:Kendrick & Co.:2/21/86

INTERNATIONAL RESIDUE LIMIT STATUS

CHEMICAL permethrin

PETITION NO 5F 3271

CCPR NO. 120

71.0000
1. ✓
7/25/85

Codex Status

Proposed U. S. Tolerances

No Codex Proposal
Step 6 or above

Residue (if Step 9): _____

Residue: permethrin and its metabolite

permethrin

DCVA and (3-phenoxyphenyl)methanol

Crop(s) Limit (mg/kg)

Crop(s) Tol. (ppm)

stone fruit - 2

cherries 3.0

plums ~~1.0~~

2.0 (12/17/85)

CANADIAN LIMIT

MEXICAN TOLERANCIA

Residue: _____

Residue: _____

permethrin

Crop Limit (ppm)

Crop Tolerancia (ppm)

plums 0.5

none

Notes: