MEMORANDUM

SUBJECT: IL-850003-4 Permethrin: 24(c) Field Corn Grown for Seed Only, in the State of Illinois [RCB #31/#33][Acc. #: None]

FROM: William L. Anthony Residue Chemistry Branch Hazard Evaluation Division (TS-769C)

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

THRU: Ed Zager, Section Head Special Registration II Residue Chemistry Branch Hazard Evaluation Division (TS-769C)

The ICI Americas, Inc. Agricultural Chemicals Division has requested 24(c) registrations for the insecticide permethrin [AMBUSH®-2E, an emulsifiable concentrate (2 lb ai/gal), EPA Registration No. 10182-18 and AMBUSH®-25W, EPA Registration No. 10182-35] on field corn grown for seed only to control the corn earworm, European corn borer, and the adult corn rootworm in the State of Illinois only.

A permanent tolerance is established for residues of permethrin [(3-phenoxypyphenyl)methyl-3-(2,2-dichloroethenyl)-2,2-dimethylcyclopropanecarboxylate], and its metabolites 3-(2,2-dichloroethenyl)-2,2-dimethylcyclopropanecarboxylic acid (DCVA) and (3-phenoxypyphenyl) methanol (3-PBA) calculated as parent in/on corn grain (field and popcorn) at 0.05 ppm (40 CFR 180.378).

Registered Use

AMBUSH®-2E and AMBUSH®-25W are registered for preemergent and foliar use on field corn/popcorn and field corn grown for seed.
Preemergent Use

To control Armyworm and Cutworms - Apply at a rate of 0.1 to 0.2 pounds active in the time period from 5 days prior to planting up to emergence of the crop. Apply as a broadcast spray in a minimum of 20 gallons of finished spray per acre with ground equipment. AMBUSHER® may be mixed with the herbicide Ortho Paraquat CL or GRAMOXONE® Paraquat in accordance with label limitations and precautions. Label dosage rates should not be exceeded.

Foliar Use

For control of Cutworms, European Corn Borer and Armyworm, apply at a rate of 0.1 to 0.2 pounds active prior to brown silk stage. Apply a minimum of 1 gallon of finished spray per acre by air and 10 gallons per acre with ground equipment. AMBUSHER may also be injected into overhead sprinkler irrigation water provided (1) an anti-backflow check valve is present between the injection point and the water source, (2) the injection system has a check valve in the line to prevent irrigation water from entering the chemical supply tank, and (3) the irrigation injection system must have interlocking on-off switches.

The following label restrictions are imposed:

1. "Do not enter treated fields until sprays have dried."

2. "Corn from fields treated with Ambush that is not used for seed production must be destroyed."

Proposed Use

For permethrin in the State of Illinois only and for use on field corn grown for seed use only. Apply 0.1 to 0.2 lb ai/A by air or ground with sufficient water to obtain full coverage of foliage. Total number of applications must not exceed six.

Conclusions and Recommendations

Since both of the permethrin formulations, AMBUSHER®-2E and AMBUSHER®-25W, are already federally registered for essentially identical uses on field corn we have no objections to the proposed section 24(c) registrations as long as the restrictions limiting applications to prior to brown silk stage is imposed on the section 24(c) labels.
Note: The proposed label restrictions limiting the use to "field corn grown for seed" and requiring that corn from fields treated with Ambush that is not used for seed production must be destroyed are not practical and should be removed from the labels. Of course, this is a moot point because of the existing federal registrations.