MEMORANDUM

SUBJECT: PP#4F3130 and PP#4F3131: Permethrin on Filberts and Walnuts, respectively. PEB's 12/18 + 12/19.

FROM: Karl H. Arne, Chemist
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THRU: Philip Errico, Section Head
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TO: George LaRocca, PM Team No. 15
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and

Toxicology Branch
Hazard Evaluation Division (TS-769C)

In our most recent review of the subject petitions (memo of 10/15/84, L. Kutney), one deficiency was noted: for both filberts and walnuts a revised Section B was needed that 1) prohibits the grazing of cover crops from treated orchards and 2) expresses the application rate for dilute sprays in lbs a.i./100 gallons applied to runoff. With this amendment, Section B for both filberts and walnuts has been revised to include the following:

"For full coverage application apply 0.05 to 0.1 pounds active per 100 gallons (based on 400 gallons finished spray per acre), spray to run-off*, or for low volume application apply 0.2 to 0.4 pounds active per acre (50 to 200 gallons furnished spray per acre). For aerial application apply 0.2 to 0.4 pounds active in a minimum of 15 gallons (for filberts; 20 gallons for almonds) of furnished spray per acre" and

"Do not graze livestock on treated orchards or feed cover crops from treated orchards to livestock."
All RCB Deficiencies are resolved.

Recommendation

Toxicological and EAB considerations permitting, RCB recommends for the proposed tolerances for residues of permethrin and its metabolites, DCVA and 3-PBA, on walnuts and filberts, both at 0.05 ppm.

RCB continues to recommend that the tolerance expression for permethrin be revised to reflect the sum of parent plus metabolites rather than parent plus metabolites calculated as parent (see PP#4E2977, memo of 4/23/84, P. Errico).

cc: PP#4F3130, PP#4F3131, Arne, R.F., Circu., SF, FDA, TOX, EAB, PMSD(T. Murtagh): typed by gm
RDI: PVE, 7/1/86; RDS, 7/2/86