

US EPA ARCHIVE DOCUMENT



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

PM 52/ISS
1670

MEMORANDUM

JUL 2 1987

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

SUBJECT: MI-870005. Section 24(c) Registration for Permethrin
on Asparagus. No Accession or MRID #. RCB # 2456.

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Hazard Evaluation Division (TS-769)

THRU: Edward Zager, Section Head
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Hazard Evaluation Division (TS-769) *Susan V. Hummel, for*

TO: George LaRocca, PM #15
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Registration Division (TS-767)

FMC Corporation has requested a Section 24(c) registration for its product Pounce® 3.2 EC (EPA Reg No 279-3014) be used on asparagus grown in Michigan. The active ingredient is permethrin [(3-phenoxyphenyl)methyl (+)-cis, trans-3-(2,2-dichloroethenyl)-2,2-dimethylcyclopropanecarboxylate].

Numerous tolerances are established for permethrin ranging from 0.05 ppm in eggs, poultry fat, meat and meat byproducts, etc to 60 ppm in or on corn fodder and forage. A tolerance of 1 ppm is established in or on asparagus for residues of permethrin and the sum of its metabolites cis, trans-3-(2,2-dichloroethenyl)-2,2-dimethylcyclopropane carboxylic acid (DCVA) and (3-phenoxyphenyl)methanol (3-PBA) [40CFR180.377].

The current label allows a maximum of 4 applications at 0.1 lbs ai/A to asparagus for control of cutworms and asparagus beetle. Application is by ground equipment using sufficient water to obtain coverage. A preharvest interval (PHI) of 3 days is imposed.

The proposed 24(c) label is identical to the registered label except for a 1-day PHI.

No residue data were attached. Residue data at 0.2 lbs ai/A (2x proposed rate) on asparagus with 1-day PHI from are summarized below (PP3E2914):

<u>States</u>	<u>Number of 0.2 lbs ai/A</u>	<u>Levels in ppm</u>		
		<u>Permethrin</u>	<u>DCVA</u>	<u>Total</u>
MI	4	0.43	0.10	0.53
WA	1	0.61	0.22	0.83
	2	0.69	0.30	0.99
	6	0.32	0.06	0.38
CA	1	0.11	0.04	0.15
	6	0.82	0.39	1.21

There was no measurable amount (<0.02 ppm) of 3-PBA.

CONCLUSION AND RECOMMENDATION

The established tolerance of 1 ppm will be adequate to cover the total residues of permethrin in or on asparagus as a result of this Section 24(c) use.

RCB recommends for the registration of this Section 24(c) use on asparagus grown in Michigan.

cc:RF, SF, circu, 24(c) F, Cheng, PMSD/ISB
 RDI:SVHummel:7/2/87:RDSchmitt:7/2/87
 TS-769:RCB:RM810:CM#2:LC:7/2/87:9