MEMORANDUM

SUBJECT: PP#4E3146 (No Acc. number) Permethrin (Ambush®) In Or On Avocados and Papayas. Amendment of 6/15/87 (RCB #2566).

FROM: W. T. Chin, Chemist
Tolerance Petition Section III
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

THRU: Philip V. Errico, Section Head
Tolerance Petition Section III
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

TO: Hoyt L. Jamerson, PM #43
Minor Uses Officer
Registration Division (TS-767)

and

Toxicology Branch
Hazard Evaluation Division (TS-769)

In a previous review (W. T. Chin, 5/28/87) regarding amendment of 4/7/87 in connection with PP#4E3146, RCB recommended for the establishment of the proposed tolerance for residues of the insecticide 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-phenoxbenzyl)methanol (3-PBA) in or on the raw agricultural commodities avocados and papayas at 1.0 ppm pending the two deficiencies identified in W. T. Chin's 5/28/87 memo.

In response to the deficiencies identified above, the petitioner, Dr. G. M. Markle (National Coordinator, IR-4), submitted a revised Section B for avocado and papaya labels dated 6/15/87 to H. L. Jamerson (EPA). The deficiencies identified above are restated below, followed by the petitioner's response and RCB's comment/conclusion.
Deficiency No. 1

Add "Note: 6.4 oz of product = 0.1 lb a.i." to the avocado label.

The Petitioner's Response to Deficiency No. 1

The revised Section B of avocado label includes: "Note: 6.4 oz of product = 0.1 lb a.i."

RCB's Comment/Conclusion on the Petitioner's Response to Deficiency No. 1

RCB concludes that deficiency No. 1 has been adequately resolved.

Deficiency No. 2

Rearrange the RATE OF AMBUSH® shown in the papaya label as follows:

<table>
<thead>
<tr>
<th>lbs a.i./A</th>
<th>fl. oz/A</th>
<th>fl. oz/100 gal¹</th>
</tr>
</thead>
<tbody>
<tr>
<td>0.2</td>
<td>12.8</td>
<td>6.4</td>
</tr>
</tbody>
</table>

The Petitioner's Response to Deficiency No. 2

The RATE OF AMBUSH® shown in the papaya label is rearranged as follows:

<table>
<thead>
<tr>
<th>lbs a.i./A</th>
<th>fl. oz/A</th>
<th>fl. oz/100 gal¹</th>
</tr>
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<tbody>
<tr>
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</tbody>
</table>

RCB's Comment/Conclusion on the Petitioner's Response to Deficiency No. 2

RCB concludes that deficiency No. 2 has been adequately resolved.

RECOMMENDATION

TOX considerations permitting, RCB recommends for the establishment of the proposed tolerance for residues of the insecticide permethrin and its metabolites DCVA and 3-PBA in or on the raw agricultural commodities avocados and papayas at 1.0 ppm.

cc: Circu., R.F., S.F., EAB, PP#4E3146, EEB TOX, PM#43, W.T.Chin, and PMSD-ISR
RDI: P.V.Errico(7/20/87); R.D.Schmitt(7/20/87)