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

OCT 30 1987

OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

Memorandum

Subject: LA-870021: Section 24(c) Registration of Ambush® Insecticide (Permethrin) on Fresh Market tomatoes. MRID No. 205211; RCB No. 2879.

From: Francis B. Suhre, Chemist *Francis B. Suhre*  
Special Registration Section II  
Residue Chemistry Branch  
Hazard Evaluation Division (TS-769)

Thru: Edward Zager, Section Head *E. Zager*  
Special Registration Section II  
Residue Chemistry Branch  
Hazard Evaluation Division (TS-769)

To: Lois Rossi, PM-21  
Herbicide and Fungicide Branch  
Registration Division (TS-767C)

The Louisiana Department of Agriculture, Office of Agriculture and Environmental Sciences, has issued a Section 24 (c) Registration for Ambush Insecticide on tomatoes (fresh market only).

Ambush® Insecticide, EPA Reg. No. 10182-18, contains 25.6% (2.0 lbs. ai/gal) permethrin, [3-phenoxyphenyl)methyl (+)-cis, trans-3-(2,2-dichloroethenyl)-2,2-dimethyl cyclopropane carboxylate] as its active ingredient. Ambush® Insecticide is a registered trademark of ICI, Americas Inc.

Tolerances are established (40 CFR 180.378b) for residues of permethrin and its metabolites 3-(2,2-dichloroethenyl)-2,2-dimethyl-cyclopropane carboxylic acid (DCVA) and (3-phenoxyphenyl)methanol (3-PBA) calculated as permethrin in and on tomatoes at 2.0 ppm.

The tolerance (2.0 ppm) in or on tomatoes was established to support the use of permethrin on fresh market tomatoes grown in Florida, only. RCB recommended against this tolerance. Detailed discussions of RCB's concerns can be found in the correspondence files for PP#8F2099/FAP#8H5190, PP#9F2243/FAP#9H5234, and PP#4F2985. For convenience sake, the concerns expressed in our memo of 11-23-84 (PP#4F2985, M. Firestone) are restated below:

1. Tolerances are set on a national basis and are not restricted to one state.

2. Label restrictions against feeding cannery by-products are impractical, since canners do not know which pesticides have been used on the product to be processed.
3. Tomatoes grown in Florida could be processed into tomato paste outside Florida.
4. RCB is unable to estimate the level of permethrin residue in Florida tomato cannery by-products (culls and skins) which could be fed to livestock and for which a Section 409 feed additive tolerance may be required.
5. Residues in meat and milk could exceed established tolerances, if tomato pomace or possibly other cannery waste were fed.
6. If the Agency allows this use of permethrin on tomatoes in Florida, it will be difficult to deny similar uses in other states.
7. The National Food Processors have already been in contact with EPA concerning confusing and impractical label restrictions in feeding cannery by-products. The Agency will just compound this problem by allowing regional use with impractical label restrictions on crops such as tomatoes.
8. Finally, it may be more advantageous for the State of Florida to submit a Section 18 for the proposed use of permethrin on tomatoes. In the meantime, the petitioner (FMC/ICI) may submit residue data reflecting a pre-blossom use.

Conclusions/recommendation

Our previous concerns over the establishment of regional tolerances for permethrin residues in or on fresh market tomatoes have not been alleviated. We recommend against this Section 24 (c) registration.

cc:R.F.,S.F.,Circu,Reviewer,Section 24(c),PMSD/ISB  
RDI:EZ:10/28/87:RDS:10/29/87  
TS-769:RCB:FBS:fbs:557-1883:CM#2:RM#814:10/30/87