MEMORANDUM

AUG 11 1988

SUBJECT: PP#8E3583. Permethrin in or on Dry Bulb Onions and Garlic.

Amendment of July 6, 1988.
RCB No.: 4104. MRID No.: None.

FROM: Maxie Jo Nelson, Chemist
Tolerance Petition Section I
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Hazard Evaluation Division (TS-769C)

THRU: Robert S. Quick, Section Head
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Residue Chemistry Branch
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TO: Hoyt L. Jamerson, P. M. 43
Emergency Response and Minor Use Section
Registration Support and Emergency Response Branch
Registration Division (TS-767C)

Toxicology Branch
Hazard Evaluation Division (TS-769C)

SUMMARY OF DEFICIENCIES REMAINING TO BE RESOLVED FOR RCB

None.

RECOMMENDATION

TOX considerations now permitting, RCB reiterates its favorable recommendation for the establishment of the proposed tolerance of 0.1 ppm for the combined residue of permethrin and the sum of its metabolites DCVA and 3-PBA in or on the raw agricultural commodities onions (dry bulb) and garlic [40 CFR 180.378(b)].

Note to PM: In accord with 40 CFR 180.1(h), the tolerance should be set as "onions (dry bulb only)". This will cover both onions (dry bulb) and garlic.
CONCLUSIONS

1a. The proposed use of Pounce® 25 WP on onions (dry bulb) and garlic has been withdrawn due to TOX concerns.

1b. The only formulation now proposed in this petition for use on onions (dry bulb) and garlic is Pounce® 3.2 EC.

2. As stated in our (M. Flood) review of 4/6/88, all deficiencies have been resolved for RCB in re this petition. We reaffirm that conclusion.

DETAILED CONSIDERATIONS

DISCUSSION

By amendment (letter) dated 7/6/88, the petitioner (IR-4) has revised Section B of this petition to delete the proposed use of Pounce® 25 WP (EPA Reg. No. 279-3051) on onions (dry bulb) and garlic.

The petitioner indicates this revision is made in response to questions raised (by TOX) on the inert ingredients in the WP formulation.

The sole formulation now remaining in this petition for use on onions (dry bulb) and garlic is Pounce® 3.2 EC (EPA Reg. No. 279-3014).

This change in no way affects RCB's previous favorable recommendation (M. Flood review of 4/6/88) for establishment of the proposed tolerance of 0.1 ppm in or on onions (dry bulb) and garlic, TOX considerations permitting, which we reiterate here.

cc: Reviewer (M. Nelson), ISB/PMSD (E. Eldredge), Circulation (7), Reading File, PP#E3583, TAS/RCB (K. Arne), FDA.