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

OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

AUG 03 1989  
MEMORANDUM

SUBJECT: PP# 6E3360 (DEB #5404). Permethrin on Collards, Turnip Greens and Turnip Roots. Amendment dated May 10, 1989. (No MRID No.)

FROM: Gary S. Otakie, P.E., Chemist Tolerance Petition Section II Dietary Exposure Branch Health Effects Division (H7509C) *D. Edwards, for*

THRU: Debra F. Edwards, Ph.D., Section Chief Tolerance Petition Section II Dietary Exposure Branch Health Effects Division (H7509C) *Debra Edwards*

TO: Hoyt Jamerson, Minor Uses Officer Emergency Response and Minor Use Section Registration Support Branch Registration Division (H7505C)

Background

The petitioner, IR-4, on behalf of the IR-4 National Coordinator, George M. Markle, and the Agricultural Experiment Station of New Jersey, requests expansion of the regional registration for permethrin on turnips to include Illinois and Oklahoma and for collards to include Illinois and Arkansas. Tolerances with regional registration have been established for residues of the insecticide permethrin [(3-phenoxyphenyl) methyl 3-(2,2-dichloroethenyl)-2, 2-dimethylcyclopropanecarboxylate] and its metabolites 3-(2, 2-dichloroethenyl)-2,2-dimethylcyclopropane carboxylic acid (DCVA) and (3-phenoxyphenyl)methanol (3-PBA) in or on the raw agricultural commodities collards at 20 ppm, turnip greens at 20 ppm, and turnip roots at 1 ppm. Use of permethrin on turnips is currently limited to Florida, Georgia, Indiana, South Carolina, Texas and Washington and use of permethrin on collards limited to Arizona, Georgia, North Carolina, Oklahoma, South Carolina and Texas based on the geographical representation of the residue data submitted.

The petitioner's current request is as follows:

"Our request is that approval be granted to expand this label to include Illinois and Oklahoma for turnips and Illinois and Arkansas for collards. Our request is based on the fact that cultural practices and climatic conditions are similar between the states already approved and those requested. Also, residue trials were conducted in states adjacent to those requested: Indiana to Illinois and Texas to Arkansas; Oklahoma is already labelled for use on collards and because of crop similarity could easily be extended to turnips. Other residue trial locations, submitted in the original petition, were South Carolina and Washington and data were included on kale, mustard greens, turnip greens and collards. "

Deficiencies Remaining to be Resolved:

1. The Minor Use Pesticide Clearance Request Forms for use of permethrin on turnips in IL and collards in IL and AR must be revised to include the following "special safety precautions:"

"Do not graze treated areas or feed refuse to livestock."

2. The Minor Use Pesticide Clearance Request Form for use of permethrin on collards in AR must be revised to include all proposed labeling - rather than citing a CA request. Proposed use must be limited to no more than eight ground applications at  $\leq 0.1$  lb ai/A with a 1-day PHI.

Conclusions:

Previously submitted residue data (PP#6E3360) from trials conducted in IN and TX support expansion of use on collards and turnips to IL, OK and AR, since these are adjacent states and the proposed use pattern is similar to that currently permitted in these geographic regions (up to 8 applications at 0.05-0.1 lb ai/A with a 1-day PHI). However prior to approval of this label expansion, the petitioner must amend the Minor Use Pesticide Clearance Request forms for use on turnips in IL and collards in IL and AR, as described above under "Deficiencies Remaining to be Resolved." These revisions will ensure that use on collards in AR is consistent with that in other states and that secondary residues will not occur in meat or milk resulting from use on these crops.

Recommendations:

DEB has no objection to the label expansion requested by IR-4 (use on turnips in IL and OK, and on collards in IL and AR) provided the deficiencies cited above under "Deficiencies Remaining to be Resolved" are adequately addressed.

H7509C:G.Otakie, CM#2, Rm810, 557-7484, ka, 8/89

cc: PP# 6E3360, Reviewer-Otakie, RF, Circu, PMSD/ISB

RDI: R.Schmitt, 8/89