MEMORANDUM


MRID# 438383-01. DP Barcode# D220851. CBTS# 16529.

From: G. Jeffrey Herndon, Chemist
Tolerance Petition Section II
Chemistry Branch I - Tolerance Support
Health Effects Division (7509C)

Through: Michael Metzger, Chief
Chemistry Branch I - Tolerance Support
Health Effects Division (7509C)

To: George LaRocca/Linda Arrington, PM# 13
Insecticide-Rodenticide Branch
Registration Division (7505C)

and

Karen E. Whitby, Head
Registration Section
Risk Characterization and Analysis Branch
Health Effects Division (7509C)

Merck and Co., Inc. is requesting the establishment of permanent tolerances for abamectin (avermectin B1) insecticide/miticide and its delta-8,9-isomer in/on the following commodities:

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<th>Commodity</th>
<th>Tolerance (ppm)</th>
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<td>Cucurbit vegetables (including melons, cucumbers, and squashes)</td>
<td>0.005</td>
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In the memo of G.J. Herndon dated 3/29/95, CBTS raised two Deficiencies with PP#4F04354: additional information was needed concerning the conditions under which the field trial samples were held and the method needed to be validated by EPA's Analytical Chemistry Lab (ACL). The deficiency concerning the conditions under which the field trial samples were held was resolved in the memo of G.J. Herndon dated 9/19/95. The method was validated by ACL and the results were received (memo of E. Greer, Jr. and D. Wright, Jr. dated 8/4/95). Based on ACL's comments, CBTS provided the following comments/conclusions in the memo of G.J. Herndon dated 9/18/95:
Additional language should be added to Method 8920 after step #9 that cautions the analyst that an emulsion can form if the mixture is shaken too vigorously, and if an emulsion forms, the compounds of interest can be lost. Additional guidance on how to clear an emulsion if it forms would also be helpful (additional centrifuge time, etc.).

In the present submission, Merck has provided the following revised method:

"HPLC-Fluorescence Determination for Avermectin B1 and Its 8,9-Z Isomer in Cucumbers and Other Cucurbits", T.A. Wehner, 10/4/95, Merck Method 8920, Rev. 1 (MRID#: 438383-01).

Conclusions and Recommendations

The current submission adequately addresses the comments/conclusions that were raised in the memo of G.J. Herndon dated 9/19/95. TOX considerations permitting, CBTS can recommend that a Section 3 registration be approved for use of AGRI-MEK 0.15 EC Miticide/Insecticide (EPA Reg.# 618-98) on the cucurbit vegetable group. Associated with this registration, a permanent tolerance should be established for residues of avermectin and its delta-8,9-isomer on the crop group cucurbit vegetables at 0.00 ppm.

A DRES run has been completed (see memo of B. Steinwand dated 10/13/95).

Merck Method 8920, rev. 1 will be sent to FDA to be incorporated into PAM II as a roman numeral method. Prior to publication in PAM II, the method is available through:

Calvin Furlow
Public Response and Program Resources Branch
Field Operations Division (7506C)
USEPA
401 M St., S.W.
Washington, D.C. 20460

cc: circu., RF, PP#4F04354, E. Haeberer (section head), G.J. Herndon.

RDI: Section Head: E. Haeberer: 12/5/95,
Branch Senior Scientist: R.A. Loranger: 12/6/95,
Branch Chief: M. Metzger: 12/7/95.