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

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OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

SECTION 18 EXEMPTION FOR USE OF PIRATE ON COTTON

To: Andrea Beard, PM Team 41 (7505C)
From: G.F. Kramer, Ph.D., CBTS (7509C) *[Signature]*

ID#: 95AL0006
DP Barcode: D217963
CBTS#: 15987

Chemical
EPA Approved Common Name: None
Chemical Name: 4-bromo-2-(chlorophenyl)-1-(ethoxymethyl)-5-(trifluoromethyl)-1H-pyrrole-3-carbonitrile
Formulation Trade Name: Pirate 3SC
Registration#: 241-GAT
Class: Insecticide-Miticide
State or Agency applying for exemption: AL
Type of exemption: Specific
Reason: To control tobacco budworm in 640,000 acres

RECOMMENDATION

TOX considerations permitting, CBTS has no objection to the issuance of this Section 18 exemption provided that a plantback interval of at least 60 days is specified for all rotational crops. An agreement should be made with FDA regarding the legal status of the treated cottonseed in interstate commerce.

CONCLUSIONS

1. The metabolism of Pirate in/on cotton is adequately understood. The residue of concern is the parent compound only.
2. The metabolism of Pirate in/on animals is adequately understood. The residue of concern is the parent compound only.
3. Adequate methods are available for the enforcement of the current tolerance expression (MRID# 427702-37). A satisfactory method trial of the cottonseed method (M-2216) has been conducted by EPA's Analytical Chemistry Laboratory and the method will be forwarded to FDA when a permanent tolerance is established. The meat and milk method has been submitted in conjunction with PP#5F4456 (MRID# 434928-57).
4. Analytical reference standards for Pirate are available from the EPA Repository, RTP.
5. CBTS anticipates that residues of Pirate are not likely to exceed the following levels as a result of the proposed use:

Cottonseed	--	0.50 ppm
Milkfat (reflecting 0.01 ppm in whole milk)	--	0.15 ppm
Fat*	--	0.10 ppm
Meat*	--	0.01 ppm

Meat By-Products"

-- 0.10 ppm

"of cattle, goats, horses, and sheep

6. The residue data used in the evaluation of this Section 18 request were generated by American Cyanamid.

A Comparison of Proposed Label and the Residue Data Parameters Used in CBTS's Decision

	<u>Proposed Use</u>	<u>Residue Data</u>
chemical	Pirate	Pirate
formulation	Pirate-Insecticide-Miticide (i.e. 3.0 lbs ai/Gallon)	Pirate-Insecticide-Miticide (i.e. 2.0 and 3.0 lbs ai/Gallon)
crop	cotton	cotton
method of application	ground, air	ground
# of applications	not stated but 3 applications at 0.35 lb ai/A would be allowed.	five at 0.40 lb ai/A
timing	postemergence	postemergence
rate/application	0.35 lbs ai./A.	0.4 lbs ai./A.
rate/year or season	1.05 lbs ai./A./season	2.0 lbs ai./A./season
maximum residue	N/A	0.32 ppm at 21 day PHI
restrictions	21 day PHI, 5-7 day retreatment interval	21 day PHI, 7 day retreatment interval

Residue data taken from: PP#3G4224-Pirate/cotton (MRID# 427702-38)

Additional Information

1. An EUP for the use of Pirate on cotton with a temporary tolerance of 0.5 ppm on cottonseed was granted in February, 1994 and CBTS's review of PP#3G4224, dated 1/26/94.
2. In conjunction with PP#5F4456, American Cyanamid has proposed permanent tolerances for Pirate in or on cottonseed, milk, milk fat, meat and meat by-products at 0.50, 0.01, 0.15, 0.01 and 0.10 ppm, respectively.
3. The Pirate label does not specify any rotational crop restrictions. Based on a preliminary review of the confined rotational crop study (MRID# 434928-51) submitted with PP# 5F4456, a 60 day plantback restriction is required for all crops. The following statement should thus be added to the Pirate label: "Do not plant rotational crops within 60 days of final application."

cc: Section 18 File, Kramer, circ., R.F., R. Griffin (RCAB)
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