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OFFICE OF
PREVENTION, PESTICIDES, AND
TOXIC SUBSTANCES

MEMORANDUM

Subject: PP# 5F4600/5H5733 - IMIDACLOPRID (ADMIRE®) ON POME FRUIT.
Review of the October 31 and November 7, 1995, Amendments.
(No MRID #s) [CBTS #s 16708 and 16709] {DP Barcodes D221536
and D221544}

From: Francis D. Griffith, Jr., Chemist
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To: Dennis H. Edwards, Jr. PM-19
Insecticide-Rodenticide Branch
Registration Division (7505C)

and

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Health Effects Division (7509C)

Thru: E. Zager, Acting Chief
Chemistry Branch I - Tolerance Support
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INTRODUCTION

Bayer Corporation, Agriculture Division, submitted these amendments consisting of cover letters dated October 31 and November 7, 1995, signed by John S. Thornton, Manager, Registrations, a revised Section B (new label for Admire®), and a revised Section F (removal of proposed tolerance for apple pomace). These amendments were submitted in response to deficiencies outlined and summarized in our November 1, 1995, review by F. Griffith (qv). Our conclusions and recommendations follow.

EXECUTIVE SUMMARY OF RESIDUE CHEMISTRY DEFICIENCIES

- NONE -

CONCLUSIONS**1. CBTS Conclusion on Directions for Use**

The petitioner has proposed an adequate set of directions for use of imidacloprid formulated as either Admire® 2 Flowable or Provado® 1.6 Flowable for use on the crop group pome fruits. Deficiency 2b is resolved as the petitioner has revised the Admire® 2 label to have the established use on apples retained.

2. CBTS Conclusion on Magnitude of the Residue - Processed Food/Feed

The petitioner has submitted a revised section F deleting the proposed apple pomace tolerance and now proposes a total imidacloprid tolerance on the pome fruits crop group at 0.6 ppm. CBTS concurs. Deficiency 9c is resolved.

RECOMMENDATIONS

TOX considerations permitting, CBTS recommends for the requested tolerance of combined residues of imidacloprid and its metabolites containing the 6-chloropyridinyl moiety, all expressed as imidacloprid on the pome fruits crop group at 0.6 ppm.

A DRES analysis can be initiated using the proposed tolerance of 0.6 ppm for pome fruit. If necessary for anticipated residues for chronic risk assessment use of the average residues on apples at 0.16 ppm and 0.33 ppm on pears and other members of the pome fruits crop group is acceptable. There is no anticipated concentration of residues in apple juice.

DETAILED CONSIDERATIONS**DIRECTIONS FOR USE/LABELING****DEFICIENCY**

2b. For apples the petitioner has the option of either submitting a revised label for Admire 2 F showing the same number of applications on apples and the same amount of imidacloprid as was originally proposed in PP# 3F4169 (1 qt or 0.5 lb ai per season), or retaining the proposed label showing an increased number of applications to 6 on apples and an increased maximum amount of imidacloprid applied to apples to 0.625 lb ai/season.

PETITIONER'S RESPONSE

The petitioner has submitted a revised label for Admire® 2 F. Directions for use are to apply 6.4 fl. ozs. (0.1 lb ai) per applica-

tion to apples, 16 fl. ozs. (0.25 lb ai) per application to pears, and maximum of 32 fl. ozs. (0.5 lb ai) for use on pome fruits/season.

CBTS COMMENTS

These directions are now in agreement with Bayer's objective of no more than 0.5 lb ai per crop per season.

The petitioner has proposed an adequate set of directions for use of imidacloprid formulated as Admire® 2 Flowable or Provado® 1.6 Flowable for use on the pome fruits crop group. Deficiency 2b is resolved as the petitioner has revised the Admire® 2 label to have the established use on apples retained.

MAGNITUDE OF THE RESIDUE - PROCESSED FOOD/FEED

DEFICIENCY

9c. The petitioner needs to submit a revised Section F deleting the proposed 4 ppm apple pomace tolerance and also request that the existing 3 ppm apple pomace (wet or dried) be deleted since dried apple pomace is no longer considered a significant livestock feedstuff and there is no real significant concentration from apples to wet apple pomace.

PETITIONER'S RESPONSE

The petitioner has submitted a revised section F deleting the proposed apple pomace tolerance. Bayer now proposes a total imidacloprid tolerance on the pome fruits crop group at 0.6 ppm.

CBTS COMMENTS

CBTS agrees with the revised Section F as Table II (September 1995) no longer lists dried apple pomace as a significant feedstuff; thus, CBTS will not consider it further in this petition. Based on the apple processing study there is no significant concentration from apples to apple pomace; thus, no feed additive imidacloprid tolerance for apple pomace is required. Deficiency 9c is resolved.

cc:R.F., Circu., Reviewer (FDG), PP#5F4600.
7509C:CBTS:Reviewer (FDG) :CM#2:Rm804C:305-5826:FDG:1/30/96:edit:fdg:2/6/96.
RDI:TPT-1:2/1/96:BrSrSci:RALoranger:2/5/96:ActBrCh:EZager:2/6/96.