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

JAN 22 1988

OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: 88-CA-11. Section 18 Specific Exemption. Phosmet on Caneberries. No MRID #. RCB # 3197.

FROM: Leung Cheng, Chemist *L. Cheng*  
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Residue Chemistry Branch  
Hazard Evaluation Division (TS-769C)

THRU: Edward Zager, Section Head *E. Zager*  
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TO: D. Stubbs/L. Pemberton, PM Team #41  
Emergency Response Branch  
Registration Division (TS-767C)

The California Department of Food and Agriculture (CDFA) has requested a Section 18 emergency exemption for the use of Imidan 50 WP on caneberries. The active ingredient is N-(mercaptomethyl)phthalimide-S-(O,O-dimethylphosphorodithioate). The official common name for this organophosphate insecticide is phosmet.

Tolerances are established for the combined residues of phosmet and its oxygen metabolite in or on blueberries (10 ppm), cranberries (10 ppm), grapes (10 ppm), and meat, fat and meat byproducts of cattle, goats, hogs, horses and sheep (0.2 ppm) [40CFR180.261].

A registration standard for phosmet (RCB chapters) was issued 4/15/86.

CDFA referred the Agency to an earlier Section 18 exemption request in which the insecticide was approved for use on crabapples and ornamentals (see M. Metzgers review of 4/18/86, 86-CA-16). CDFA stated that because many apple orchards are infested with various kinds of wild caneberries, the caneberries may also be inadvertently sprayed in the process of treating apple trees for control of apple maggots. Some of these berry bushes are bearing and their crop could be harvested.

According to RCB's review of 4/18/86, the 1986 request (86-CA-16) allows application of Imidan 50 WP at a rate of 8 lbs

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product (4 lbs ai) per acre for a maximum of 8 applications per season at 10-14 day intervals by ground equipment. A PHI of 7 days is imposed. This use pattern is identical to that for apples.

For this Section 18 request the residue of concern consists of phosmet and its oxygen metabolite.

Since no residue data on caneberries are available, we will estimate residues of phosmet on caneberries on the basis of the grape data. Caneberries and grapes are in the same crop group.

The registered use on grapes allows foliar applications, on an as-needed basis, at 1 lb ai/A with a 7-day PHI or 1.5 lbs ai/A with a 14-day PHI.

The most similar use pattern, 4 foliar applications to grapes with a 50% WP formulation at 1.25 lbs ai/A, resulted in combined residues of phosmet and the oxygen metabolite of 10.6 ppm (0 day), 7.26 ppm (7 day), and 6.07 ppm (21 day) (Phosmet Registration Standard, RCB chapters, 4/15/86).

RCB estimates the inadvertent residues of phosmet and its oxygen metabolite on caneberries are not likely to exceed 10 ppm.

Caneberries are not used for animal feed. Therefore, established tolerances in meat, fat and meat byproducts will not be exceeded.

#### CONCLUSIONS

1. For this Section 18 request, the residue of concern consists of phosmet and its oxygen metabolite.

2. Analytical methodology is available for enforcement (PAM II, Method III).

3. Combined residues are not likely to exceed 10 ppm in or on caneberries as a result of this emergency use of Imidan 50 WP.

4. Established tolerances on meat, fat and meat byproducts will not be exceeded as a result of this request.

5. Reference standards are available from the Pesticides and Industrial Chemicals Repository at RTP, NC.

RECOMMENDATIONS

RCB has no objections to this Section 18 request, TOX considerations permitting. An agreement should be made with FDA regarding the legal status of treated caneberries in commerce.

cc:Circ, RF, Phosmet Section 18 F, Cheng, PMSD/ISB  
RDI:EZager:1/21/88:RDSchmitt:1/21/88  
TS-769:RCB:CM#2:RM810:Cheng:1/20/88:1:1/22/88