

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

JUL 1 9 1989

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

Memorandum

Subject:

WA-890019. 24(C) Special Local Needs Registration

for Use of Naled on Alfalfa Grown for Seed.

No Accession Number / No MRID Number

DEB #5529

From:

Michael S. Metzger, Chemist Muhael S. Metger Dietary Exposure Branch Health Effects Division (H7509C)

Thru:

Francis B. Suhre, Acting Section Head,

Dietary Exposure Branch

Health Effects Division (H7509C)

To:

William H. Miller, PM 16 Team Registration Division (H7505C)

The State of Washington has issued a Section 24(C) Special Local Needs Registration authorizing the use of naled (Dibrom 8 Emulsive, EPA Reg. No. 239-1281-59639) on alfalfa grown for seed use only. Dibrom 8 Emulsive contains 58% naled by weight (7.2) lbs. a.i./gal). Naled will be used to control lygus bugs and thrips. The Washington State Department of Agriculture (WSDA) considers use of pesticides on alfalfa grown for seed only, a non-food / non-feed use.

Tolerances are established for residues of naled (1,2-dibromo-2,2-dichloroethyl dimethyl phosphate), and its conversion product 2,2-dichlorovinyl dimethyl phosphate, on all raw agricultural commodities ranging from 0.05 ppm in meat, milk and eggs, to 10 ppm on forage grasses and forage legumes; and include a tolerance of 0.5 ppm for residues in or on all raw agricultural commodities not specifically listed (40 CFR 180.215; 180.3(e)(5)). A Registration Standard has been completed for naled (Residue Chemistry Chapter, 10/25/82).

The proposed use calls for a maximum of 3 applications/cutting at 7-day intervals at 1/2 - 1 pint product (0.45-0.9 lbs.a.i.)/A/application. The following restriction appear on the 24(C) label:



Do not use treated seed or crop parts for food, feed or oil purposes. Do not graze treated alfalfa. Treated alfalfa is not to be used for sprouting.

All seed alfalfa treated with ${\tt Dibrom}^R$ is to be tagged at the conditioning plant "not for human or animal consumption".

All alfalfa seed screenings shall be disposed of in such a way that they cannot be distributed or used for food or feed.

The WSDA has issued "Rules Related to Use of Pesticides on Seed Alfalfa" to insure compliance with the above restrictions (included as an attachment to this review). As long as this policy is adhered to, we have no objections to this 24(C) registration.

Conclusions and Recommendations

OPP has determined that the program set up by the WSDA will prevent diversion of the treated crop to food or feed uses. Therefore, DEB has no objections to this 24(C) registration.

Attachment cc with attachment: M.Metzger (DEB), non-food use file, naled SF, naled Reg. Std. File, E. Eldredge (PMSD/ISB), Circu (7), RF RDI:F.B.Suhre:FBS:7/18/89:REZ:7/18/89
H7509C:DEB:M.Metzger:MM:Rm803a:CM#2:7/18/89

FOR DISTRIBUTION AND USE ONLY IN THE STATE OF WASHINGTON

DIBROM® 8 Emulsive

EPA Req. No. 239-1281-59639 EPA SIN No. WA-890019

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Do not apply this product through any type of irrigation system.

ALPALFA GROWN FOR SEED ONLY

Lygus: Apply 1 pt. per acre on 7 day interval.

Thrips: Apply 1/2 pt. per acre. Apply in 10 - 20 gals. if sprayed by ground equipment or in 3 - 5 gals. if sprayed by air. Do not exceed 3 applications per cutting.

Do not use treated seed or crop parts for food, feed or cil purposes. Do not graze treated alfalfa. Treated alfalfa is not to be used for sprouting.

All seed alfalfa treated with Dibrom is to be tagged at the conditioning plant "Not for human or anumal consumption."

All alfalfa seed screenings shall be disposed of in such a way that they can not be distributed or used for food or feed.

Do not expose bees to direct Dibrom application. Do not expose bees to treated crop for 12 hours after treatment.

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All applicable directions, restrictions, and precautions on the EPA registered label are to be followed.

This labeling must be in the possession of the user at the time of pesticide application.

24(c) Registrant

Valent U.S.A. Corporation P.O.Box 8025 Walnut Creek, CA 94564-8025

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